

NHTSA-99-5087-1



U.S. Department  
of Transportation  
National Highway  
Traffic Safety  
Administration

DEPT. OF TRANSPORTATION  
DOCKET SECTION

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# Memorandum

ORIGINAL

Subject: **IN-FORMATION:** Submittal to Docket NHTSA #99-5087  
NHTSA Safety Performance Standards Program Meeting

Date: **FEB 9 1999**

From: L. Robert Shelton  
Associate Administrator for  
Safety Performance Standards

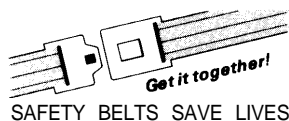
Reply to  
Attn. of:

To: Docket Section

Please insert in the Section of the Docket titled, "Safety Performance Standards Program Meeting, " the following:

1. Federal Register Notice Vol. 63 No. 199, FR 55424 dated Thursday, October 15, 1998 for Notice of December 17, 1998 NHTSA Industry Public Meeting in Detroit Michigan.
2. Agenda of Meeting.
3. Scorecard dated December 17, 1998, subject: Commitments made at September 17, 1998 Industry/Public meeting.
4. Rulemaking Actions Published since September 17, 1998.
5. Transcript of Proceedings for the NHTSA Safety Performance Standards Program Meeting on December 17, 1998.

Attachments



**DEPARTMENT OF TRANSPORTATION****National Highway Traffic Safety  
Administration****Safety Performance Standards  
Program Meeting- NHTSA 99-5080**

**AGENCY:** National Highway Traffic Safety Administration.

**ACTION:** Notice of NHTSA industry meeting.

**SUMMARY:** This notice announces a public meeting at which NHTSA will answer questions from the public and the automobile industry regarding the agency's vehicle regulatory program.

**DATES:** The Agency's regular, quarterly public meeting relating to its vehicle regulatory program will be held on Thursday, December 17, 1998, beginning at 9:45 a.m. and ending at approximately 12:30 p.m., at the Clarion Hotel, Romulus, MI. Questions relating to the vehicle regulatory program must be submitted in writing with a diskette (WordPerfect) by Tuesday, November 17, 1998, to the address shown below or by e-mail. If sufficient time is available, questions received after November 17 may be answered at the meeting. The individual, group or company submitting a question(s) does not have to be present for the question(s) to be answered. A consolidated list of the questions submitted by November 17, 1998, and the issues to be discussed, will be posted on NHTSA's web site ([www.nhtsa.dot.gov](http://www.nhtsa.dot.gov)) by Monday, December 14, 1998, and will be available at the meeting. The next NHTSA vehicle regulatory program meeting will take place on Thursday, March 18, 1999 at the Clarion Hotel, Romulus, MI.

**ADDRESSES:** Questions for the December 17, NHTSA Technical Industry Meeting, relating to the agency's vehicle regulatory program, should be submitted to Delia Lopez, NPS-01, National Highway Traffic Safety Administration, Room 5401.400 Seventh Street, SW., Washington, DC 20590, Fax Number 202-366-4329, e-mail [dlopez@nhtsa.dot.gov](mailto:dlopez@nhtsa.dot.gov). The meeting will be held at the Clarion Hotel, 9191 Wickham Road, Romulus, MI.

**FOR FURTHER INFORMATION CONTACT:** Delia Lopez, (202) 366-1810.

**SUPPLEMENTARY INFORMATION:** NHTSA holds a regular, quarterly meeting to answer questions from the public and the regulated industries regarding the agency's vehicle regulatory program. Questions on aspects of the agency's research and development activities that relate directly to ongoing regulatory actions should be submitted, as in the

past, to the agency's Safety Performance Standards Office. The purpose of this meeting is to focus on those phases of NHTSA activities which are technical, interpretative or procedural in nature. Transcripts of these meetings will be available for public inspection in the DOT Docket in Washington, DC, within four weeks after the meeting. Copies of the transcript will then be available at ten cents a page, (length has varied from 100 to 150 pages) upon request to DOT Docket, Room PL-401, 400 Seventh Street, SW, Washington, DC 20590. The DOT Docket is open to the public from 10:00 a.m. to 5:00 p.m. Questions to be answered at the quarterly meeting should be organized by categories to help us process the questions into an agenda form more effectively. Sample format:

- I. RULEMAKING
  - A. Crash avoidance
  - B. Crashworthiness
  - C. Other Rulemakings
- II. CONSUMER INFORMATION
- III. MISCELLANEOUS

NHTSA will provide auxiliary aids to participants as necessary. Any person desiring assistance of "auxiliary aids" (e.g., sign-language interpreter, telecommunications devices for deaf persons (TDDs), readers, taped texts, brailled materials, or large print materials and/or a magnifying device); please contact Delia Lopez on (202) 366-1810, by COB November 17, 1998.

Issued: October 9, 1998.

**L. Robert Shelton,**

*Associate Administrator for Safety  
Performance Standards.*

[FR Doc. 98-27719 Filed 10-14-98; 8:45 am]

BILLING CODE 4910-69-M

# **NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION**

## **SAFETY PERFORMANCE STANDARDS PROGRAM MEETING**

**Clarion Hotel - Romulus, Michigan**

**December 17, 1998**

### **I. RULEMAKING**

#### **A. Crash avoidance**

##### **AAMA**

1. Please provide an update on current and planned FMVSS 108 rulemaking activities regarding recodification / simplification of FMVSS 108 (previous estimates were 10/98 for the headlamp portion, and 2/99 for the remainder).
2. Please update the status of the agency's harmonization actions on lighting, including the fall 1998 GTB meeting. Also, what is the status of the SNPRM previously anticipated for 1 1/98 covering geometric visibility and rear amber side markers?
3. The Agency proposed changes to the **DRL** requirements in FMVSS 108 that likely will cause a shift in DRL mechanizations toward turn signal **DRLs**. Please summarize comments received on the recent DRL NPRM and indicate, if possible, NHTSA reaction to the comments.
4. When does the Agency plan to terminate the rulemaking regarding special safety features on power windows (Docket 96- 117, FMVSS 118), (previously scheduled for 10/98)?
5. The NHTSA has indicated it will make a regulatory decision by the end of this year, followed by a 2/99 notice, regarding revisions to FMVSS 124 to facilitate electronic accelerator controls. Please update the status of this effort and provide any additional insight regarding the agency's views on this subject.
6. When does the agency intend to terminate the rulemaking to extend FMVSS 13.5 to vehicles over 3 500 kg? (previous estimate was 10/98)
7. Please update the status and anticipated timing for a notice on the results of NHTSA's inter-office team discussions and testing regarding the agency's assessment of thermal or pressure locking radiator caps.
8. Please update the timing for a regulatory decision on the FMVSS 102 petition filed by BMW to facilitate electronic shift controls. (previous estimate was not before 4/99)

## **A. Crash avoidance**

### **AAMA**

9. Please update the current status of **NHTSA's** anticipated proposals regarding petitions for FMVSS 103, 104, and 202 **functional** equivalence determinations and harmonization.

## **B. Crashworthiness**

### **AAMA**

10. On August 4, 1998 NHTSA published the Final Rule amending the upper interior impact requirements of Standard 201 to permit the installation of dynamically deploying upper interior head protection systems. Please update the expected publication date of the laboratory test procedure for this aspect of FMVSS 201.
11. Based on information from the 9/98 meeting, NHTSA intends to resolve the procedure issues (multiple impact testing and chin contact) related to the amended FMVSS 201, through interpretations and by a technical correction notice which was anticipated by 11/98. Please comment on the status of these efforts.
12. Please provide an update on the status of any plans for rulemaking with respect to an upgrade of FMVSS 202 (Head Restraints) and/or FMVSS 207 (Seating).
13. What is the revised timing for the FMVSS 205 NPRM to invoke the updated version of the ANSI Z26 standard?
14. Please indicate if the agency still anticipates an FMVSS 205 request for comments notice by the end of 1998 regarding alternative glazing and side impact air bags for improved occupant retention. Please provide any new information on a possible course(s) of action in this area.
15. When will the agency be able to provide **airbag** cut-off switch statistical information on its web site?
16. Please provide updated information regarding the status of Part 572 rulemaking to propose to adopt the 3-year-old child test dummy (proposed in the recent FMVSS 208 NPRM). Please also update the anticipated timing to propose to adopt the CRAB1 12 month child test dummy.
17. Please update the status of **NHTSA** activity regarding frontal offset impact testing. When will the agency be able to report the results of this testing, and release detailed test reports and data?
18. Please update the status of the agency's next actions regarding proposed rulemaking for child restraint anchorages (FMVSS 210a and b).

## **B. Crashworthiness**

### **AAMA**

19. At the **9/98 NHTSA/Industry** public meeting, it was indicated that a final rule on FMVSS 216 testing procedures was expected by **10/98** for vehicles under 6,000 pounds GVWR equipped with raised roofs. Please provide an update on the status.
20. What is the current status of a possible regulatory decision regarding the agency's research comparing static and dynamic roof crush performance?
21. Please provide any new information on the status/timing of NHTSA efforts to upgrade FMVSS 301, Fuel System Integrity.
22. What is the status of the next agency action following the **5/30/97 NPRM** (Docket 93-20; Notice 15) which proposed to delete material specifications and manufacturing process requirements from FMVSS 304, Compressed Natural Gas Fuel Containers?
23. Please update the status of any consideration by the NHTSA to **specify** additional performance requirements for CNG fuel containers, with specific reference to the updated version of the **ANSI/NGV2** industry standard for these containers.
24. Please update the agency's plans with regard to the LTV-car crash compatibility issue.
25. What is the present status of the agency's response to the **AAMA/AIAM** petition regarding international harmonization of the side impact standard?
26. What is the status of the planned negotiated rulemaking concerning multi-stage vehicle certification and is there anything that can be done by interested parties to help advance the process?

### **AIAM**

27. What are the expected final rule and compliance dates for the universal child restraint anchorages (FMVSS 210) proposal?
28. What are **NHTSA's** planned dates for an NPRM and final rule on including an offset frontal barrier test in FMVSS 208 (separate from the current advanced air bag proposal)?
29. It has been reported that the agency has granted the Advocates for Highway Safety's petition to upgrade the dynamic test requirements of FMVSS 214. What are the agency's plans?

## **B. Crashworthiness**

### **AIAM**

30. For this year's LINCAP program, we have learned the agency may use the **SIDHBIII** as the test dummy. While we were informed that for the present, NHTSA would not use the head injury criteria generated from these tests in LINCAP star rating, what is the agency's thinking for the future?
31. What's the expected date for termination of the rulemaking to extend FMVSS 135 to vehicles over 3500 kg?
32. On August 4, 1998 NHTSA published the Final Rule amending the upper interior impact requirements of Standard 201 to permit the installation of dynamically deploying upper interior head protection systems. When can we expect publication of the laboratory test procedure for this aspect of FMVSS 201?
33. What is the status of rulemaking to adopt the small female Hybrid III, 6 year-old child, and 3 year-old child and CRAB1 12 month child test dummies in FMVSS 208 and Part 572?
34. What's the latest expectation for publication of the **final** rule on FMVSS 216 testing procedures for vehicles under 6,000 pounds GVWR equipped with raised roofs?

## **II. Consumer Information**

### **AAMA**

35. Please update the current status of NHTSA's consumer information initiatives on Crashworthiness ratings, NCAP, side impact NCAP, braking, lighting and rollover.
36. At the 9/98 meeting, NHTSA stated that it expected a final rule by the end of the year regarding the new, more graphic rollover label. What is the status of this rulemaking?
37. Please update NHTSA assessment of the Consumer Groups' petition filed in mid-February '98 seeking the publication of extensive air bag design and performance data, possible agency action, and the time frame for any action.
38. Is the brochure summarizing all labeling and consumer information requirements in the FMVSSs still expected to be released soon?

## **II. Consumer Information**

### **AAMA**

39. In May 1998, the NHTSA published an NPRM proposing to remove a Consumer Information Regulation (Part 575) requirement directing that vehicle manufacturers provide Uniform Tire Quality Grading information at the point of sale of new motor vehicles. The comment period ended July 20th. What is the status of this rulemaking?

## **III. Miscellaneous**

### **AAMA**

40. Please provide a update on the status of potential future rollover rulemaking. What is the current estimate of when NHTSA may make a regulatory decision on whether and how to proceed with consumer information versus an FMVSS? What is the current agency thinking and how may this be resolved?
41. What is the status of the agency's study and possible action regarding inside trunk releases?
42. Please provide the status and NHTSA views on industry efforts to promote a global glazing regulation.
43. Please summarize the comments the NHTSA received in response to the FMVSS 305 NPRM concerning electric vehicle crashworthiness. What is the likely next step in this rulemaking, and when might that next step be taken?

### **AIAM**

44. When is the expected date for the final rule on conversion to SI units in FMVSS 208, 214, and Part 572?
45. What is the status of the agency notice to propose a longer time between the Part 573 letter and the requirement to **notify** dealers to stop selling cars?

### **National Automobile Dealers Association (NADA)**

46. What is the current status of the motor vehicle content label review?

## **III. Miscellaneous**

### **III. Miscellaneous**

#### **Center for Auto Safety (CFAS)**

49. Will NHTSA conduct additional air-bag depowering tests, and if so, will they involve a greater variety of vehicles than the set of tests conducted in preparation of the depowering amendment?
50. What new data, if any, does NHTSA have concerning the occurrence of “bottoming out” with redesigned **airbags** (i.e., MY 1998 and later vehicles) involved in high speed collisions?



SCORECARD

12/17/98

Commitments Made at September 17, 1998, Industry/Public Meeting

std	Description	Target	New Est.	Actual
102	Electronic Shift Control - Agency Decision	5/99		
108	Geometric Visibility -- SNPRM	11/98		12/98
108	Simplification - Headlamp--NPRM	10/98		11/98
108	Simplification - Other--NPRM	2/99	6/99	
108	ABWS - Agency Decision	10/98		11/98
108	DRL - Regulatory Decision	4/99		
111	Norton -- Regulatory Decision	10/98	2/99	
118	Power Windows -- Agency Decision	10/98	2/99	
121	SAE Alignment -- NPRM	11/98	3/99	
124	Electronic Accelerator Control -Agency Deci.	2/99		
135	Thermal Testing -- Termination	11/98	1/99	
135	Pedal Force -- Regulatory Decision	10/98	1/99	
201	Reconsideration petitions - NPRM	11/98	2/99	
202	Upgrade/Harmonization -- Agency Decision	12/98	2/99	
205	Alternative Glazing - Agency Decision	12/98	3/99	
206	Upgrade -- Regulatory Decision	1/99		
207	Regulatory Decision	TBD	7/99	
208	"Advanced" Air Bags -- NPRM	9/98		9/98
209	Pelvic Restraint -- Final	10/98	1/99	
213	Standardized System -- Final	11/98	1/99	
213	Weber - Agency Decision	12/98	2/99	
216	Roof Crush Resistance -- Final	12/98	1/99	
216	Upgrade -- Agency Decision	TBD	4/99 .	
221	School Bus Joint Strength -- Final	10/98		11/98
301	Upgrade for Light Duty Vehicles -- Reg Dec.	12/98	4/99	
302	School Bus Flammability	TBD		
304	CNG - Agency Decision	11/98		12/98
305	Electric Vehicle CW - NPRM	10/98		10/98
572	Small (5th Percentile) Female -- Final	4/99		
572	CRAB1 12 Month Old -- NPRM	11/98	1/99	
572	3 Year Old -- NPRM	10/98	12/98	
572	6 Year Old -- Final	4/99		
575	UTQGS -- Final(AIAM)	4/99		

Electric Vehicle Driving Range -- Final	9/98		12/98
Functional Equivalence -- Reg. Decision			
103/104	10/98	2/99	
108	10/98		10/98
214	TBD		
Multistage Certification Reg Neg	TBD	2/99	
Radiator Caps -- NPRM	2/99		
Rollover - Agency Decision	12/98	1/99	
SW Label -- Final	12/98	2/99	

	<u>Last Mtg</u>	<u>This Mtg</u>
EARLY	0	0
ON-TIME	4	3
DELAYED	29	26

# RULEMAKING ACTIONS PUBLISHED SINCE SEPTEMBER 17, 1998

<u>STD./PT.</u>	<u>ACTION</u>	<u>DESCRIPTION</u>
108	Extend Cmt Period	Extends the comment period on an NPRM (August 7, 1998 - 63 FR 42348) proposing that the maximum light emitted from daytime running lamps ( <b>DRLs</b> ) be reduced (September 18, 1998 - 63 FR 49891)
	N-PRM	In response to a petition for <b>rulemaking</b> , the agency proposes to amend the standard so that manufacturers of motor vehicles with headlamp concealment devices may choose between comply with that existing provision, or with a new provision incorporating by reference the United Nations Economic Commission for Europe's standard (ECE standard) on headlamp concealment devices (October 28, 1998 - 63 FR 57638)
	Statement of Policy	Announces that the agency will participate in an international effort under the aegis of the United Nations' Meeting of Experts on Lighting to develop a process for evaluating new ideas for signal lamps on vehicles (November 4, 1998 - 63 FR 59482)
	NPRM	Proposes to reorganize the sections relating to headlighting (November 13, 1998 - 63 FR 63258)
	Final Rule	Technical amendment to remove superseded paragraph relating to headlamps aimed by moving the reflector relative to the lens and headlamp housing, or vice versa from the March 10, 1997 (62 FR 107 10) Advisory Committee on Regulatory Negotiation final rule (November 17, 1998 - 63 FR 63800)
208	SNPRM	In response to a petition for rulemaking, the agency proposes to amendments the standard which are intended to harmonize the geometric visibility requirements of the US for signal lamps and reflectors with those of the Economic Commission for Europe (ECE) (December 10, 1998 - 63 FR 68233)
	NPRM	Proposes to upgrade the occupant protection standard to require advanced air bags (September 18, 1998 - 63 FR 49957)
	Public Mtg	Announces a public meeting on technical issues relating to the advanced air bag proposal (October 26, 1998 - 63 FR 57091)
213	Final Rule	Adopts as final most of the amendments made by interim final rules (April 17, 1997 - 62 FR 18723 and June 4, 1997 - 62 FR 30464) to the air bag warning label requirements (October 1, 1998 - 63 FR 52626)

221	Final Rule	Requires school bus body panel jointists to be capable of holding the body panel to the member to which it is joined when subjected to a force of 60 percent of the tensile strength of the weakest joined body panel, extends the applicability of the standard to school buses with a GVWR of 10,000 pounds or less, narrows an exclusion of maintenance access panels from the requirements of the standard, and revises testing requirements (November 5, 1998 - 63 FR 59732)
304	Final Rule	In response to petitions for rulemaking, the agency deletes the material and manufacturing process requirements in the standard on compressed natural gas fuel container integrity. The agency believes that this amendment will facilitate technological innovation, without adversely affecting safety (December 3, 1998 - 63 FR 66762)
305	NPRM	Proposes a new Federal motor vehicle safety standard that would establish requirements and test procedures which address safety issues exclusive to electric vehicles (October 13, 1998 - 63 FR 54652)
538	Final Rule	Establishes a minimum driving range for dual fueled electric passenger automobiles, otherwise known as hybrid electric vehicles (HEVs) (December 1, 1998 - 63 FR 66064)
571	Final Rule	Technical amendment to correct typographical and other errors in the May 27, 1998 (63 FR 28922) final rule converting English measurements to metric (September 24, 1998 - 63 FR 50995)
572	Final Rule	Modifies the Hybrid III test dummy's clothing and shoes, and the hole diameter in the femur flange in the pelvis bone flesh (October 7, 1998 - 63 FR 53847)
574	NPRM	In response to a petition for rulemaking, the agency proposes to require the date of manufacture to be shown in four digits instead of the currently-required three, and to reduce the minimum size of the digits from the current 6 mm (1/4 inch) to 4 mm (5/32 inch) (October 19, 1998 - 63 FR 55832)
595	NPRM	Proposes a limited exemption from a statutory provision prohibiting dealers, repair businesses and other specified commercial entities from removing safety equipment or features installed on motor vehicles pursuant to the Federal motor vehicle safety standards and from altering the equipment or features so as to adversely affect their performance (September 28, 1998 - 63 FR 51547)
—	Req for Cmt	Agency says comments and information pertinent to the execution of the school bus research plan (October 26, 1998 - 63 FR 57089)

ORIGINAL

# TRANSCRIPT OF PROCEEDINGS

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NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION

SAFETY PERFORMANCE STANDARDS PROGRAM MEETING

CLARION HOTEL - ROMULUS, MICHIGAN

THURSDAY, DECEMBER 17, 1998

Pages: 1 through 87

Place: ROMULUS, MICHIGAN

Date: DECEMBER 17, 1998

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## HERITAGE REPORTING CORPORATION

*Official Reporters*

1220 L Street, NW, Suite 600

Washington, D . C .

(202) 6284888

# TRANSCRIPT OF PROCEEDINGS

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# TRANSCRIPT OF PROCEEDINGS

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Date: DECEMBER 17, 1998

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**HERITAGE REPORTING CORPORATION**

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NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION

SAFETY PERFORMANCE STANDARDS PROGRAM MEETING

CLARION HOTEL - ROMULUS, MICHIGAN

THURSDAY, DECEMBER 17, 1998

Heritage Reporting Corporation  
(202) 628-4888



1 Romulus, Michigan  
2 Thursday, December 17, 1998  
3 Approximately 9:52 a.m.

4 MR. SHELTON: Well, good morning.  
5 Welcome to our prestigious December Detroit meeting,  
6 the one the people are always dying to come to from  
7 NHTSA.

8 I'm actually very pleased to see  
9 all these people here. I thought everyone would be  
10 scurrying around doing advanced **airbag** comments.

11 I don't know how we end up  
12 scheduling this meeting on the same day the advanced  
13 **airbag** comment period closed, but **it's** truly a day  
14 that will live in infamy.

15 I was actually out at Ford  
16 yesterday and they were scurrying around all day.  
17 Usually I go out there and meet with about 20 or  
18 30 people. Now it was like three. Everyone was  
19 writing advanced **airbag** comments, but I'm glad  
20 everyone has come out today.

21 The weather is not too bad. This  
22 is, I guess, the third December Detroit meeting that  
23 Steve and I have done together and we haven't had it  
24 snow yet; pretty amazing. I'm pleased with that,  
25 although a couple of days ago Lou Camp was in my

1 office and he was raving about how wonderful the  
2 weather is in Detroit and said, "**When** you come up, you  
3 **don't** have to bring a coat or anything,!" so of course  
4 I came up here yesterday and it was raining  
5 and **it's** cold this morning, so I hope Lou  
6 keeps his day job and isn't looking for a new career  
7 as a weather forecaster.

8 We have our usual handouts here.  
9 They're inside instead of outside for once. We have  
10 the score card with our latest guesses on when **we're**  
11 going to get stuff out.

12 I do note that we got several items  
13 out on time, so that's always a pleasant surprise from  
14 our perspective.

15 We also have the list of rulemaking  
16 actions that we've published. This time it is a  
17 fairly long list just to demonstrate that we're not  
18 just sitting around waiting for people to file  
19 advanced **airbag** comments; **we're** not just twiddling our  
20 thumbs. It does include a number of items that have  
21 been outstanding for a while, such as school bus joint  
22 strength, deleting manufacturing processes for  
23 compressed natural gas cylinders, and the ever popular  
24 minimum driving range for dual fuel electric vehicles,  
25 which I think was one of the first questions someone

1 asked me when I came down to this job a couple of  
2 years ago. Now we've finally got it out of here.

3 Also we have copies of the agenda  
4 there for those of you who don't pull it off the web.  
5 I believe **it's** identical to the version **that's** on the  
6 **website. It's** a much shorter agenda. **I'm** not sure  
7 what happened. Normally we have 70 to 75  
8 questions and today we only have 50 questions. I  
9 noticed that AIAM did not submit any crash avoidance  
10 questions. The rumor going around is that they're  
11 trying to get Steve to talk less.

12 **I'll** instead be a little more  
13 charitable and say that we do such a good job of  
14 keeping you informed on what's going on in crash  
15 avoidance, there's no questions to ask **I'm**  
16 suspicious actually that people are going to go back  
17 to their office this afternoon and tell their bosses  
18 that was a real long agenda, 90 to 100 questions, and  
19 they're actually all going holiday shopping this  
20 afternoon, and **that's** why we have the short list.

21 Also we have the sign-in sheet. I  
22 hope everybody signs in. Believe it or not, we do use  
23 that. **I'm** often just rummaging through that after  
24 meetings to find out who was there and what their  
25 phone number is in case I need to call them for some

1 reason.

2 Maybe one of these days **we'll** put  
3 all the names on little pieces of paper and do a  
4 raffle and give away prizes for people who actually  
5 attend these meetings.

6 Donuts, I want to thank George  
7 Parker from AIAM, I am, for the donuts. I hope they're  
8 satisfactory to everyone. I ran into George a couple  
9 of nights ago and with the dissolution of AAMA at the  
10 end of this month, normally March would be the AAMA  
11 donut opportunity. Since we're not sure **what's**  
12 happening with the new trade association, George has  
13 agreed to provide donuts for the next meeting also, so  
14 he gets some carry-forward credits to that. Assuming  
15 there is a new trade organization for the domestics  
16 and whomever else they can then pay George back by doing  
17 donuts two sessions in a row.

18 It is kind of sad to have this the  
19 last meeting where AAMA exists as a distinct entity.  
20 I hope to see essentially all the people who work for  
21 AAMA back here in March under the guise of the new  
22 organization, assuming there is one.

23 I also want to point out that I got  
24 a ride from the hotel I was staying this morning from  
25 Dave Houston who is grinning ear to ear because **he's**

1       about to retire. I want to congratulate Dave for  
2       all his work in this area. Dave, of course, is one  
3       of my favorite speakers at this meeting because he  
4       always asked questions -- well, actually they tend to  
5       be speeches, but he usually gets a question in there  
6       somewhere, so I hope Dave will keep coming as just a  
7       regular member of the public.

8                       With that, I think I'll turn it  
9       over to Mr. Kratzke and we'll start off with the  
10      agenda.

11                      MR. KRATZKE: Thank you and I will,  
12      of course, be mindful of the need to be short. I  
13      would like to add a personal note to Dave Houston. He  
14      and I have worked together for a couple of years and  
15      he was very instrumental in getting us information  
16      when we wanted it when other people weren't exactly  
17      forthcoming.

18                      If Ford was going to do it, Dave  
19      wanted to go first and we appreciated it.

20                      With that, I will start with  
21      Question Number 1 from the soon to be defunct AAMA.

22                      "Please provide an update on current  
23      and planned recodification of Standard 108."

24                      The proposal for the headlamp  
25      portion was published November 12th. Comments are due

1 February 10th. We spent a lot of time on that. We  
2 made sure our Compliance people understood what was in  
3 it and where it was.

4 We hope that the lighting  
5 designers, the vehicle manufacturers, will spend some  
6 time going over the proposal, being sure they  
7 understand what it says and why it says it in pointing  
8 out problems now.

9 We'd like this not to be our most  
10 interpreted standard. We'll like to be able to say  
11 what we're trying to say and just deal with the  
12 occasional odd question.

13 The rest of the rewrite will  
14 probably be out for public comment in June. This is a  
15 four-month delay from the previous estimate. It's  
16 partly the workload for Pat Boyd who is the person who  
17 is rewriting it, and partly the time we're spending  
18 making sure -- when we have engineers who don't work  
19 in lighting, we've asked people to look at this  
20 standard and then ask them a question, "Where would  
21 you go to find it?" and if they can't answer that  
22 question, we keep rewriting it.

23 The goal at the end of this really  
24 is that anyone will be able to go to the lighting  
25 standard, see what it says and see what the

1 requirements are. That hasn't been the case for a  
2 while.

3 Number 2. This is one where I'd  
4 better be very short for the benefit of those  
5 interested. Update the status of harmonization  
6 actions including the fall 1998 GTB meeting in South  
7 Africa and what's the status of the supplemental  
8 notice of proposed rulemaking on geometric visibility.

9 At the September meeting those of  
10 you who were here heard me go on and on about how we  
11 were somewhat disappointed that the GTB, which had been  
12 asked to develop a harmonized worldwide beam pattern,  
13 had participated in the negotiated rulemaking that  
14 NHTSA had conducted and had agreed with the beam  
15 pattern we came out with and had not used that beam  
16 pattern for anything.

17 The meeting in South Africa  
18 occurred during the week of November 23. The U.S.  
19 government did not attend. However, we have received  
20 an informal summary of the meeting from the chair of  
21 the **GTB's** Coordinating Committee for Headlamp  
22 Harmonization and from Mr. Jim Wright of Ford who was  
23 the lone vehicle manufacturer present.

24 The Coordinating Committee has  
25 apparently reached an agreement, although all the Is

1       aren't dotted and Ts crossed, on a proposal they hope  
2       to present to the full GTB.

3                       This proposal, as we understand it,  
4       represents a halfway compromise between the headlamp  
5       beam pattern laid out in our negotiated rulemaking and  
6       the current European headlamp beam pattern.

7                       I'm hoping, of course, that there  
8       is no relationship between the absence of NHTSA in  
9       South Africa after **we've** attended every meeting for  
10      two years and the ability of all other participants to  
11      immediately reach an agreement. I would also note  
12      that at the September quarterly meeting I went on at  
13      great length about how we would like the GTB to use  
14      our beam pattern as the starting point for harmonized  
15      beam pattern and, of course, that **didn't** happen.

16                      Being the constructive people we  
17      are, we will review in detail the GTB proposal when we  
18      get it down with Is dotted and Ts crossed and probably  
19      present comments, if not to the GTB which apparently  
20      is all in favor of this, we will certainly present  
21      those comments to the meeting of experts in Geneva  
22      when the GTB reports its results there because **that's**  
23      the group that charged them with doing this.

24                      Regarding geometric visibility, we  
25      published our supplemental notice a week ago on



1 December 10th. For those of you who aren't reading  
2 our little accomplishments handout, **it's** at 63 Federal  
3 Register 68233.

4 Under our present lighting  
5 regulations vehicle manufacturers have to produce four  
6 different lighting packages for the identical vehicle  
7 to allow that vehicle to be sold in the United States,  
8 the United Kingdom, continental Europe and Japan.

9 NHTSA would like to work with other  
10 countries to identify the best of the current  
11 standards and accept that best standard in all of the  
12 countries.

13 In this case, the continental  
14 European standard for visibility of their signal lamps  
15 and reflectors requires substantially enhanced  
16 performance compared to the current U.S. standard.

17 The U.S. standard now in place  
18 generally requires visibility ten degrees off center.  
19 The European requires visibility at 45 degrees off  
20 center. This we think is a chance to show  
21 harmonization working to everyone's benefit. We think  
22 consumers would get better safety and lower costs,  
23 manufacturers would be able to comply with a single  
24 world standard for this equipment.

25 Nevertheless, there have been a few

1 occasions where more stringent standards even in the  
2 name of harmonization **aren't** exactly greeted with open  
3 arms, so **we've** proposed an alternative of adopting the  
4 most current SAE standards for the performance of  
5 those signal lights and reflectors.

6 The SAE standards improve the  
7 performance requirements generally out to around 25  
8 degrees. This obviously gives a choice to the public  
9 and to the industry. **We're** waiting to hear either one  
10 of these represents a step up from the current  
11 requirements. **We're** interested in learning whether  
12 harmonization or voluntary standards is the preferred  
13 option and we are ready to review your comments. The  
14 comment closing date is March 10, 1999.

15 The same supplemental notice  
16 terminates action on adopting amber as an alternative  
17 color to red for rear side markers and reflex  
18 reflectors. After we reviewed the comments to the  
19 NPRM **we've** decided that a significant change in the  
20 standardized signals that have been used by vehicles  
21 in the U.S. for more than 30 years ought to be  
22 accompanied by some persuasive data that would  
23 demonstrate safety benefits from that change.

24 Absent that data, **we're** not going  
25 to consider it further. And therefore **we're** not going

1 ahead with amber, it would continue to require red at  
2 those positions.

3 Any questions?

4 MR. HOUSTON: Dave Houston, Ford  
5 Motor Company. Are you looking for positive  
6 conclusions on the data or if the data is not harmful,  
7 if the data is neutral, **let's** say, what would be your  
8 response there?

9 MR. KRATZKE: We are looking for positive  
10 benefits. In early November we published a notice  
11 on signal lighting and the policy that we were going to  
12 use to evaluate signal lighting changes to  
13 standardization and we indicated that we think there  
14 are positive benefits from having standardized  
15 signals.

16 To change the standardized things  
17 we would like to see data showing a positive benefit,  
18 something more than **it's** neutral.

19 Todd Nicholson.

20 MR. NICHOLSON: Todd Nicholson from  
21 Guide. I understand that this geometric visibility  
22 rulemaking will also apply geometric visibility rules  
23 to front fog lamps, but it will not otherwise regulate  
24 the front fog lamps, is that correct?

25 MR. KRATZKE: That is correct. The

1 geometric visibility requirements that are going to be  
2 there are for all the signal lamps that are identified  
3 now by ECE or SAE. If they're -- so, yes, front fog  
4 lamps will have geometric visibility requirements.  
5 They **don't** have to be there, but if I have them, they  
6 have to meet those specs.

7 Any others questions? I note that  
8 no one from AIAM said anything. Maybe there's some  
9 truth to this rumor.

10 Number 3 asks about our changes to  
11 the DRL requirements, a summary and NHTSA reaction to  
12 the comments. You probably all know that when **we're**  
13 in rulemaking we **can't** give you detailed comments on  
14 this. I would note that **we've** received more than 250  
15 comments on this proposal, most of them from  
16 individuals.

17 By way of comparison, we received  
18 **120** comments on the **airbag** depowering proposal.  
19 **That's** not to suggest the rulemakings are comparable  
20 in terms of complexity, the resources the agency is  
21 spending on it, the media attention devoted to it or  
22 anything like that. **It's** just to note the relative  
23 level of public interest that we are receiving on it.

24 With that, the comments can be  
25 summarized pretty simply. One, a lot of people truly

1 hate **DRLs**. Two, many people think that **DRLs** could be  
2 a good safety device if they weren't so annoying. 3,  
3 vehicle manufacturers **don't** want their existing DRL  
4 design freedoms taken away and are able to offer many  
5 reasons why they should be allowed to continue having  
6 relatively unrestricted choices, and, 4, some European  
7 and Japanese commenters apparently believe that this  
8 rulemaking was **NHTSA's** way of indicating it can now  
9 accept the ECE lower beam headlamp pattern because the  
10 proposed DRL requirements at and above horizontal  
11 appeared to replicate the ECE beam pattern.

12 So **that's** my thumbnail summary.

13 We want to develop a rule that markedly reduces  
14 DRL glare complaints while not appreciably affecting the  
15 valuable DRL conspicuity.

16 In other words, **it's** okay to listen  
17 to music, it might even enhance the quality of your  
18 life, but you **can't** play it at full volume so it  
19 annoys everyone around you.

20 We want to set the appropriate  
21 level based on available data, research and  
22 engineering analysis while giving due weight to the  
23 public comments. **I'd** also like to state that NHTSA is  
24 not considering the ECE lower beam pattern in any way  
25 shape or form.

1 Presumably, this will get the same  
2 attention that it got last time when I said we would  
3 really like the GTB to consider our negotiated  
4 rulemaking beam pattern.

5 However, as we said expressly in  
6 our proposal, the headlamp beam pattern represents a  
7 balance between visibility for the driver in the  
8 vehicle and glare for other drivers.

9 When **you're** balancing, different  
10 people make different choices, you assign different  
11 values to different things. The U.S. has opted more  
12 towards visibility for the driver while the ECE has  
13 been more concerned with preventing glare.

14 Those are reasonable choices. At  
15 the negotiated rulemaking, we had the Japan Automobile  
16 Standards Internationalization Center, two European  
17 lighting manufacturers groups there. Everyone agreed  
18 the balance the U.S. struck in 1996 was acceptable to  
19 everyone.

20 **We're** not aware of any studies or  
21 data suggesting we struck the wrong balance for that.  
22 The balance for **DRLs** we think is much simpler. The  
23 DRL needs to be bright enough to assure adequate  
24 conspicuity. There's no safety benefit for anyone in  
25 having a DRL brighter than that.

1                   Thus **we're** going to be far less  
2 tolerant of glare from **DRLs** and other signal lamps  
3 than we are currently for headlamps. **It's** not the  
4 same issue.

5                   Now, I know **that's** going to get  
6 some attention and I know there's no questions from  
7 AIAM. Anyone else?

8                   Oh, George Parker.

9                   MR. PARKER: George Parker, AIAM.  
10 Of the 250 comments you got, are a lot of those  
11 generated from the National Motorists' Association?  
12 Were they form letters for example or very similar in  
13 content?

14                  MR. KRATZKE: Were they form  
15 letters, no. I haven't actually read all 250. The  
16 ones that **I've** read haven't mentioned the National  
17 Motorists' Association, but I again **don't** know.

18                  MR. PARKER: If you think of the  
19 population of people that can comment on something  
20 like that, if there's really a lot of concern about  
21 glare 250 comments **isn't** really all that many out of  
22 -- but also personal observation, there must be a lot  
23 of sensitive people to glare out there because they  
24 certainly **don't** bother me.

25                  MR. KRATZKE: We can debate our

1 relative sensitivity to glare after.

2 MR. SHELTON: Not to mention our  
3 relative sensitivities.

4 MR. KRATZKE: But **you're** right, 250  
5 divided by the population of the United States is  
6 probably a relatively low percentage.

7 If you compare it to the comments  
8 from the public on other things, and **I'm** more than  
9 willing to total it with side impact, **airbag**  
10 depowering, any recent comments you want, I know **we've**  
11 had -- somewhere we got thousands of comments,  
12 especially on the CAFE standards. **It's** a relatively  
13 high total based on **NHTSA's** experience over 30 years.

14 We **don't** routinely get that number  
15 of comments from the public. **We've** never gotten  
16 anything approaching that from the public on a  
17 lighting issue.

18 MR. PARKER: I think there is sort  
19 of a campaign against daytime running lights  
20 regardless of what the scientific merit is of the  
21 requirement, there is a campaign against glare levels  
22 of certain versions of daytime running lights, so 250  
23 in that case may not be all that many, but **that's** for  
24 you to decide.

25 MR. KRATZKE: I appreciate the



1 insight. Todd?

2 MR. NICHOLSON: You explained the  
3 position of NHTSA on this issue. Could you go into  
4 the harmonization aspects of the DRL in terms of  
5 Canada and Scandinavia and how that relates to the  
6 priorities you mentioned?

7 MR. KRATZKE: Sure. We have  
8 consulted repeatedly with Canada on this proposal. We  
9 sent them our rulemaking support papers so that  
10 Transport Canada would comment at the same time as the  
11 other offices in the agency.

12 We have had meetings with them.  
13 **We've** gotten some exchanges of views. We understand  
14 what they think. **We've** gone out of our way to make  
15 sure they're involved.

16 As for the European countries, we  
17 have decided that we are probably going to introduce  
18 an informal document at the April GRE meeting that  
19 will try to better understand why turn signals or  
20 amber lamps are not permitted as **DRLs** in Europe.

21 We take harmonization seriously on  
22 this and we certainly will consider harmonization in  
23 anything that we come out with.

24 Any other questions? If not **I'm**  
25 really going to have to speed up. **I'm** doing it again.

1                   Number 4 is when did the agency  
2           intend to terminate the rulemaking for power windows.

3                   It should happen next month, I will  
4           say January. In my ongoing effort to share all the  
5           information I have, Bob signed a letter a couple of  
6           days ago where we are going to enter into a pilot  
7           program with the National Center for Health  
8           Statistics.

9                   One of the things **that's** happened  
10          in our agency for quite a while is our data on vehicle  
11          related deaths that **don't** happen in a highway crash is  
12          non-existent. **It's** not gathered in our FARS data.  
13          **It's** not often found in NASS.

14                  We have occasionally been able to  
15          use Consumer Product Safety Commission data,  
16          especially their NEISS, and for those of you who **don't**  
17          like acronyms, **it's** the National Electronic Injury  
18          Surveillance System; thank you.

19                  **We've** also gotten some sporadic  
20          data from the Department of Health and Human Services.  
21          What **we're** trying to do here -- the National Center  
22          for Health Statistics actually has access to all of  
23          the death certificates in the United States for a  
24          given year and we would like to look at things that  
25          have codes that suggest they may have been related to

1       some specific problems.

2                       The problems **we're** interested in  
3       looking at are children that are left in a vehicle,  
4       **people**, adults and children that are locked in a  
5       trunk, and children who are strangled by power windows  
6       or sunroofs.

7                       And one of the good things with  
8       sorting through the cases is we should be able to at  
9       least say for that one year this is how many deaths  
10      there were and see what happens at the end of that  
11      pilot, but we are going to terminate power windows for  
12      now and **we're** going to look a little harder.

13                      Any questions?    **I'm** really going  
14      to have to speed it up now.

15                      Question 5, regulatory decision on  
16      the accelerator control standard. We have decided to  
17      propose an updated standard that will allow more  
18      design freedom in achieving the specified fail-safe  
19      performance but does not reduce the scope of the  
20      existing standard.

21                      Some have suggested that we ought  
22      to limit the fail-safe scope of the standard to  
23      disconnection failures of the pedal position sensor  
24      input to the computer and ignore all of the computer  
25      output connections to the engine and any other sensor

1 inputs with potentially large effects on engine power,  
2 like fuel pressure.

3 We have had productive meetings  
4 with TMA, the Truck Manufacturers Association for  
5 those of you who **don't** know Bill **Leasure's** group, and its  
6 engine suppliers in August and with the soon to be  
7 defunct AAMA and AIAM in November, the manufacturers  
8 have been very helpful in suggesting proposed test  
9 methods for an updated standard.

10 At this point NHTSA plans to  
11 develop a proposal for public comment that reflects  
12 the inputs **we've** had with the vehicle manufacturers  
13 and get something out on the table for the public to  
14 more clearly express what we are trying to do.

15 The best guess is we will publish  
16 that in May, '99.

17 Any questions? Good.

18 Number 6. This is real fast. When  
19 does the agency intend to terminate the rulemaking to  
20 extend 135 to vehicles over 3,500 kilograms. January.  
21 '99.

22 Number 7, update the status and  
23 timing for radiator caps. We still anticipate a  
24 notice of proposed rulemaking to require pressure  
25 locking radiator caps. Federal Register we hope

1 March, '99, one month later than originally, but still  
2 on track.

3 Question 8, the Standard 102  
4 petition, the PRDL shift lever sequence. Timing for  
5 regulatory decision. **It's** still April.

6 We recognize BMW has raised a  
7 legitimate issue regarding the continuing need for a  
8 30 year old standard and shift levers in general when  
9 technology is now in place that would permit joysticks  
10 and other shift lever mechanisms that weren't possible  
11 and weren't envisioned in 1968.

12 No one benefits from NHTSA or any  
13 other agency stubbornly clinging to a requirement just  
14 because that requirement was debated thoroughly and  
15 judged appropriate 30 years ago.

16 If **it's** something like Standard  
17 **107's** limits on the reflectivity of metallic horn  
18 rings, we certainly ought to get rid of it.

19 On the other hand, **we'd** like to  
20 consider the value of standardized automatic shift  
21 lever patterns.

22 When a driver now gets into either  
23 a **minivan** or a sports car and regardless of whether  
24 the vehicle is made in North America, Europe or Japan,  
25 the shift lever has a neutral position between drive

1 and reverse to minimize misshifting and it has a park  
2 position at the end and you can go to it -- you **don't** even  
3 need to look at that.

4 The PRNDL requirement doesn't seem  
5 especially onerous and it does seem to effectively  
6 address the safety concern. We have met again with  
7 BMW so we can better understand what problems PRNDL  
8 poses for new technology and to learn how that company  
9 is unable to address its desire for improved shift  
10 lever patterns unless we get rid of the  
11 standardization.

12 **We're** still going to try to  
13 announce something in April. Any questions?

14 Well, this is my final one. In  
15 fact, **it's** coming to Bob for the second part of this,  
16 so I will try and speed through it. In **103** and **104** we  
17 got a petition for functional equivalence that was  
18 jointly submitted by AAMA and AIAM.

19 The manufacturers provided some  
20 comparison drawings of the windshield wiping and  
21 defrosting areas under the current U.S. standards and  
22 under the European standards.

23 NHTSA was relying on the  
24 conventional wisdom which our understanding was that while  
25 there would be some differences, it would be a wash.

1                   They would be relatively  
2       insignificant because you change the measuring points,  
3       but we thought sometimes we would be better, sometimes  
4       Europe would be better, it **wouldn't** matter and it  
5       would be easy.

6                   Of course the conventional wisdom  
7       was wrong. The manufacturers provided us with an  
8       overlay that showed the European areas are  
9       consistently ten to 20 percent smaller than the  
10      corresponding U.S. areas.

11                  Being the creative customer service  
12      guys and women we are, we thought, well, you could  
13      explain that for the defrost/defog requirements  
14      because the European standard requires it to be  
15      cleared more quickly and surely this will do it.

16                  When we looked more carefully, we  
17      discovered that we were using the wrong SAE standard.  
18      If you use the right SAE standard, the defog rates,  
19      the clearing efficiency, the time to clear the area  
20      are identical in the United States and Europe, so that  
21      leaves us back at well, you clear less of the  
22      windshield and it's ten to 20 percent less.

23                  Probably **that's** something we would  
24      deny unless someone would explain why 20 percent  
25      smaller area is no different or something. One

1 possibility that's been raised by the manufacturers is  
2 that perhaps all this difference occurs above the  
3 shade band and the shade band is not regulated for  
4 visibility.

5 So we've said, okay, give us an  
6 overlay and show how much of it is above the shade  
7 band and if **it's** all in an area where **we'll** let you  
8 tint it down to any level you want, **that's** fine and  
9 then **we'll** all be happy.

10 The manufacturers have told us that  
11 we're going to get that information the first week in  
12 January. If we **don't** get that information, we will  
13 almost certainly deny the petitions for functional  
14 equivalence.

15 However, we have been in touch with  
16 the manufacturers regarding a global technical  
17 regulation they're trying to draft to address this.  
18 NHTSA wants to be at the meeting of experts in Geneva  
19 **that's** going to talk about this.

20 We think it certainly ought to be  
21 possible to come up with an accommodation that would  
22 make the United States and Europe and the vehicle  
23 manufacturers all comfortable and happy.

24 And with that -- oh, Mr. Parker?

25 MR. PARKER: George Parker for



1 AIAM. Would you propose to submit that to the  
2 parallel process WB-29?

3 MR. KRATZKE: I **don't** know. At the  
4 last meeting Tom Carr asked that and I indicated we're  
5 now planning on working through the existing meetings  
6 of experts without making it a global technical  
7 regulation.

8 If the industry wants to make it a  
9 global technical regulation, we **don't** have any  
10 problems with that. We haven't spent a great deal of  
11 time thinking about which is the appropriate forum.

12 We really think **it's** one that if we  
13 try hard, we should be able to come up with an  
14 acceptable area for both of those standards that would  
15 satisfy the U.S. and Europe.

16 MR. PARKER: That gets back to the  
17 group of experts anyway.

18 MR. KRATZKE: Yes, it does. **Any**  
19 other questions?

20 If not, I'll turn this over to Bob  
21 for the second half of this and a lot of others.

22 MR. SHELTON: Thanks, Steve.  
23 Normally we have two microphones at these meetings so  
24 we can interject obnoxious comments about each other's  
25 presentations, but since we **can't** do that, although it

1 produces entertainment value for me and Steve, perhaps  
2 it does lead to a shorter meeting. Maybe **that's** why  
3 there's only one microphone here. Is there a plot?

4 The second half of Question 9  
5 asks about Standard 202, the head restraint standard.  
6 As **I've** indicated, I believe, at the last couple of  
7 meetings we are still going forward with an NPRM to  
8 significantly update Standard 202, which is almost  
9 certainly going to propose basically what we modeled  
10 on the European standard. On the other hand it  
11 will also almost certainly add **backset** requirements  
12 and also positional locking requirements.

13 One of the things that has delayed  
14 us getting this done is that we were doing a quick research  
15 program with the University of Wisconsin to come up  
16 with an optional dynamic compliance test. That work  
17 has been completed and our current plans are to issue  
18 that NPRM by February.

19 As **I've** said before, in that  
20 proposal we're also certainly going to propose  
21 allowing functional equivalents with the European  
22 requirement between the current time and the time of the  
23 effective date of the new requirements. Any questions on that?

24

1 MR. **STANDO**: Mike **Stando**, Ford.

2 I'm not sure I understood. The University of  
3 Wisconsin study is going to lead you to --

4 MR. SHELTON: It's done. The work  
5 is done to an optional dynamic compliance option and  
6 that will be -- the work on that I believe will be  
7 placed in the docket next month.

8 Currently, there is a dynamic  
9 compliance option. At one point we had talked about  
10 eliminating that option. People wanted us to keep it,  
11 and so we had to -- when we started modeling our new  
12 proposal on the European standard we had to come up  
13 with a new dynamic compliance option.

14 MR. WILLSON: Do you know the docket  
15 number?

16 MR. SHELTON: No, we don't have a  
17 docket number. That was Howard **Willson** from Chrysler.

18 MR. WILLSON: DaimlerChrysler.

19 MR. SHELTON: DaimlerChrysler,  
20 excuse me. I've been actually very very good about  
21 that. I correct other people on that.

22 Number 10 asks about the laboratory  
23 test procedure for Standard 201. This is new 201, not  
24 classic 201. This is the pole test where we put the  
25 final rule out in August. Right now we expect that

1 laboratory test procedure to be available next month  
2 in January. We received a number of petitions on that  
3 rule and some of those have to be addressed in the  
4 test procedure.

5 For example, we were petitioned by  
6 AIAM because in the rule we say impact speed can be  
7 any velocity up to 18 miles per hour and they pointed  
8 out that that means we could tow it into the  
9 pole at something like ten miles an hour or some  
10 very low speed where the head bag would not deploy  
11 and then the dummy's head would whack the column  
12 rather severely.

13 So we are going to address that and  
14 there's also a humidity requirement that we're going  
15 to address, but we expect to get that all resolved  
16 very quickly and have that laboratory test procedure  
17 available next month.

18 Any questions on that?

19 MR. RO: Kevin Ro, Toyota. So  
20 you're going to address those petitions in the test  
21 procedure?

22 MR. SHELTON: No, no, no. **We'll**  
23 have a separate notice addressing the petitions  
24 directly, but on the other hand some of them feed  
25 right into the laboratory test procedure.

1                   For example, the laboratory test  
2 procedure has -- the draft one -- has specifications  
3 for the impact velocity, so they have to be consistent  
4 with each other, but there will be a separate notice  
5 responding to the petitions.

6                   MR. RO:   Next month?

7                   MR. SHELTON:   Hopefully next month,  
8 yeah.   Any other questions on that?

9                   Question 11 goes back to classic  
10 201 asking about a number of issues that still  
11 exist with testing on the traditional 201 involving  
12 the guided head form into the multiple impact points  
13 on the vehicles.

14                   We had a meeting in August with  
15 seemingly everybody in this room I think, AAMA, AIAM,  
16 the world, to discuss a lot of the issues regarding  
17 damage to components for multiple impacts, the effect  
18 of chin contacts on head calculations and other issues  
19 relating to the free motion head form test procedure.

20                   We're taking a two-phase approach  
21 to dealing with those.   We are going to have a notice  
22 of proposed rulemaking out next month, I hope, which  
23 will increase the minimum vertical distance, **that's**  
24 vertical distance, between multiple impacts from the  
25 current level of 150 millimeters to 200 millimeters.

1                   **That's** consistent with the height  
2       of the free motion head form impact device. The  
3       horizontal difference will still remain at 150  
4       millimeters.

5                   We're also going to address a  
6       number of issues through a letter of interpretation  
7       from the agency on multiple impacts, chin contact,  
8       glazing contact, how windows and sunroofs are  
9       positioned and some other minor points. The plan is  
10      to get both of those items out next month.

11                  Any questions on that?

12                  Number 12, the first part of Number  
13      12 is the same -- was the last part of Question 9, but  
14      the second part of Question 12 deals with Standard  
15      207.

16                  As I'm sure people are aware, we've  
17      been doing a lot of research on this over the years,  
18      the past ten years or so. A lot of research reports  
19      have recently been submitted to the docket.

20                  There's a March, '98 University of  
21      Virginia report on computer modeling of a  
22      representative seat, looking at what happens if we  
23      strengthen the seat and how **that's** going to affect  
24      performance. That is in the docket, **it's** in Docket  
25      4064 if you check the dock management system. I

1 believe **it's** Item 24 in that docket.

2 Also Easi Engineering has been  
3 working on a design of an advanced seat which they are  
4 going to build and the Research Office will test  
5 sometime next year, but the Easi report on the seat is  
6 expected to be in the same Docket 4064 sometime next  
7 month.

8 **We've** also done static testing of  
9 seatbacks from 25 current vehicles, testing these  
10 seatbacks to failure. That report will be placed in  
11 the docket next month. It indicates, as I believe  
12 we've discussed before, that the seats typically  
13 exceed the current standard by three or four times.

14 We've also done an analysis of  
15 National -- what does NASS stand for now? National  
16 Automotive Sampling System.

17 We did the analysis of NASS data to  
18 correlate seat failure or non-failure to injury rates  
19 and **that's** also been placed in the same Docket 4064.

20 Right now, what **we're** working on is  
21 a new benefit analysis for this. We expect to have  
22 that work done sometime this spring and our current  
23 plan is to make a decision on whether to upgrade  
24 Standard 207 by the summer of 1999.

25 Any questions on that?

1                   Number 13 asks about Standard 205  
2                   and updating it to the current version of the ANSI  
3                   standards, Standard 226.

4                   When are the General Motors people  
5                   going to get into an ANSI and have Standard **Z28? I'm**  
6                   still waiting for that one.

7                   We have a petition from **AAMA** from  
8                   '97 to amend that. We have granted that petition.  
9                   There is some -- the changes in the ANSI standard  
10                  revolve the use of production parts for tempered glass  
11                  fracture tests replacing the carbon arc light source  
12                  with a Xenon light source and some other changes.

13                  We think this is a very  
14                  straightforward matter and we expect to issue a  
15                  proposal in January.

16                  Any questions?

17                  Okay, Number 14. 14 deals with  
18                  another 205 issue, the ever-popular glazing team and  
19                  ejection mitigation glazing, which has been going on  
20                  for quite a while.

21                  As **I've** discussed, I believe, at  
22                  the last meeting or two our plan is to issue a request  
23                  for comments soon on this. We had a status report on  
24                  the work that's been done in this area in November of  
25                  '95.



1                   There is a new draft status report  
2     circulating around the agency right now. It discusses  
3     -- **it's** basically a research status report. It  
4     discusses the tests of the 40 pound **impacter** tests  
5     that were done to test the retentionability of the  
6     glazing by VRTC, some free motion head form tests and  
7     some high G slid tests to assess neck injury, and  
8     a new estimate of potential benefits of ejection  
9     mitigation glazing.

10                  That report is expected to be  
11     published in January, '99. **That's** just a status  
12     report. Work is starting on drafting a request for  
13     comment on this issue.

14                  One of our big concerns is -- one  
15     of our big issues these days is whether technology  
16     such as head **airbags** is making improvements in  
17     reducing ejection through glazing somewhat redundant.

18                  Right now our schedule is to get  
19     out a request for comment on this by March.

20                  Any questions?

21                  Number 15. When will the agency be  
22     able to provide **airbag** on/off switch data. It says cutoff  
23     switch. Somebody else has gotten their names wrong.  
24     On/off switch statistical information on its **website**

1 I'm not sure why this question is being asked  
2 actually. Maybe it can be clarified.

3 We have -- on the **website** there is  
4 a report **that's** put up twice a month which provides  
5 fairly comprehensive data on on/off switch  
6 installation.

7 It has a number of authorizations  
8 by month and by week. It breaks it down between  
9 drivers, passengers, and both positions. **It's** got a  
10 compilation of the reasons why people are requesting  
11 them. **It's** got authorizations by state, **it's** got them  
12 by manufacturer and model year, and **it's** got weekly  
13 and monthly installation rates.

14 Also in the Docket Management  
15 System there is a separate report, this is in Docket  
16 3111, which is generated somewhat irregularly, but it  
17 is a very specific report on authorizations and  
18 installations by make, model and model year.

19 **It's** a long Excel printout which is  
20 placed in the docket every couple of months. Actually  
21 there is a new version -- well, **it's** not that new, it  
22 was actually done in October, but somehow our Chief  
23 Counsel's office forgot to put it in the docket, which  
24 is being placed -- if it hasn't been placed in the  
25 docket by now, it will be placed in the docket

1       imminently.

2                       **I've** also asked the contractor who  
3       does the work for us to update that and run a new one  
4       so I can stick that in the docket in the very near  
5       future.

6                       Is there any other information on  
7       these on/off switch installations that people think  
8       they're not getting from our material?

9                       It really is just a long table,  
10      make, model, model year and it breaks it down between  
11      driver switch, passenger switch and both sides.

12                      And then we have the one **that's** on  
13      the **website**. I didn't bring enough copies for  
14      everybody, but **it's** got all these lovely charts, just  
15      fascinating stuff.

16                      No other questions on that?

17                      16, update **what's** happening on the  
18      dummies for the advanced **airbag** rule. We only have  
19      two left. **It's** the three year old and the CRAB1 12  
20      month old dummy. The three year old notice is done.  
21      I just have to get it up to the administrator's office  
22      to get him to sign off on that. That will happen  
23      imminently, so I expect that rule to get out by the  
24      end of this month.

25                      The CRAB1 is very close also.

1       There is actually a meeting of the SAE Dummy Test  
2       Equipment Task Force beginning of December to look at  
3       some issues on that.

4                       One of the issues that arose is  
5       that the dummy's skin got thinner, a thin-skinned  
6       dummy goes with thin-skinned bureaucrats, and made  
7       the dummy lighter and some people were concerned about  
8       the mass of the dummy.

9                       They were convinced to drop their  
10      concerns.    So I expect the CRAB1 proposal to be out in  
11      early January.

12                      Any questions on that?

13                      Question 17, please update the  
14      status of NHTSA activities regarding frontal offset  
15      testing, when will we report the results.

16                      We've had two rounds of frontal  
17      offset testing, one that was done in fiscal '97, one  
18      which was done in fiscal '98.

19                      The first round of a test has been  
20      in the docket for quite a while.   For those of you who  
21      haven't seen it, **it's** in 3332 on the Docket Management  
22      System.

23                      The second round of tests was  
24      11 vehicles emphasizing depowered **airbags**; the first  
25      round did not.   As in the first round, we had a

1 mixture of 60 kilometer per hour offset testing with  
2 the fifth and 50th percentile dummies and also the 30  
3 mile an hour belted barrier testing with both the  
4 fifth and 50th percentile dummies.

5 That work has been completed and we  
6 expect the test results to be in the NHTSA docket by  
7 the end of this month.

8 For both the first and second set  
9 of test results we did see a potential problem with  
10 dummies exceeding the injury assessment reference  
11 values for the -- for extensions for the fifth  
12 percentile female dummy in both the offset tests and  
13 in the 30 mile an hour belted barrier test.

14 The second -- the vehicles that  
15 were chosen for the second round were somewhat  
16 selected based on IIHS testing, which indicated in  
17 their 40 mile per hour testing that certain vehicles  
18 had opportunity for high intrusion and high lower leg  
19 loadings.

20 We saw similar results in our  
21 testing. We saw high tibia bending moments for both  
22 50th percentile male and fifth percentile female  
23 dummies.

24 We are also working on a report to  
25 Congress on this, an updated status report on this,

1 and we currently plan to issue that in March. As **I've**  
2 said before, **we're** still looking to get out a proposed  
3 rule on this standard probably sometime in mid '99.

4 Any questions?

5 **18, I've** been asked this question  
6 so many times in the last few weeks **I'm** really tired  
7 of it, believe it or not. **What's** the status of the  
8 final rule on the uniform child restraint anchorages.

9 Well, it will be out soon. We're  
10 done with it, **it's** cleared the department. **It's** at  
11 the Office of Management and Budget right now. I  
12 haven't checked their **website**. I don't know if  
13 anybody has, but they post every rule. They post the  
14 date when they received rules on their **website**.  
15 They got it at the beginning of this week.

16 We expect them to clear it soon.  
17 We do not have a date that we have selected for  
18 issuing it. **It's** not like **it's** a secret and **I'm** not  
19 telling you. Trust me, we just do not have a date yet  
20 for it, but I do expect it to be out very soon.

21 We have met with the Office of  
22 Management and Budget staff a couple of times on this  
23 rule. We briefed them very early in the process on  
24 where we are going and the costs and benefits of the  
25 rule, and discussed timing and other related issues.

1                   We had them in, we had all these  
2 child seats and vehicle seats and they were plugging  
3 stuff in and unplugging them and just having a swell  
4 time, so I **don't** expect it to take too long and **we're**  
5 hoping for the end of this month. If not, it will  
6 happen in early January.

7                   Any questions?

8                   Okay, Question 19. Another one of  
9 my favorites. I think a couple of meetings ago I said  
10 there were a number of rulemakings I just hate to be  
11 asked about because they seem to linger forever.

12                  I guess the obvious response is,  
13 **"Well, Bob, if you hate them so much, get them out."**  
14 Well, believe it or not, I am trying. I don't totally  
15 control the rulemaking process in NHTSA.

16                  This deals with an old Ford and  
17 Recreation Vehicle Industry Association petition on  
18 Standard 216 testing for roof crush resistance for  
19 vehicles with sloped or raised roofs.

20                  We had an NPRM out in '97 where we  
21 talked about using different positioning for the  
22 standard plate or perhaps a smaller plate for certain  
23 vehicles. I believe I said at the last meeting we are  
24 back to the bigger plate, the standard plate, but just  
25 move its position for testing depending on the slope

1 or anything else on the vehicle roof that sticks out.

2 There's a minor enforcement issue  
3 we still have to work out within the agency, but we  
4 are planning 'to get this rule out next month.

5 Any questions?

6 MS. **BURKS** (FORD): Next month?

7 MR. SHELTON: You don't believe me,  
8 do you? I do not want to answer this question in  
9 March. I want it to be on the list of  
10 accomplishments, but I'm sure **Belinda** Burks will  
11 remind me if it's not.

12 Number 20 relates to what we're  
13 going to do beyond this rule on roof crush. We have  
14 completed a number of dynamic vehicle drop tests to  
15 actually pick up a vehicle and drop it on its roof to  
16 see how that -- that's fun testing and we compared the  
17 results of status roof crush tests to these 20 drop  
18 tests and that's in the docket, it's in 1742. **It's**  
19 also on the NHTSA **website** in the R & D crashworthiness  
20 section.

21 We are -- right now what we're  
22 doing is several years ago the agency did an analysis  
23 of crash data to correlate injury patterns versus the  
24 amount of roof crush in crashes. That was done in the  
25 very early 90s.



1                   We decided we needed to update that  
2                   analysis. We had actually hoped to get that work done  
3                   by last month. Right now, we expect it will be done  
4                   next month in January. Then what **we'll** have to do  
5                   once we have agreement on that within the agency among  
6                   the staffs, **we'll** have to brief the administrator on  
7                   this and determine what the prospects are for  
8                   rulemaking.

9                   So it will be -- **we'll** probably  
10                  brief the administrator by February or March at the  
11                  latest, and make a regulatory decision on where we're  
12                  going to go, but I **don't** know what that will be.

13                  At this point in time I **can't**  
14                  really project when **we'll** have something else out on  
15                  it, but I'll try to give you all an update in March.

16                  Any questions on that?

17                  **Okay**, 301, Question 21. This is  
18                  another one **we've** been working on for quite a while.  
19                  In '95 we had a NPRM on upgrading 301. As I've talked  
20                  about recently, our efforts have been focused on  
21                  upgrading the rear impact portion of the standard.

22                  Currently we use a 4,000 pound big  
23                  billboard barrier which strikes the vehicle squarely  
24                  in the rear at 30 miles an hour. We've been doing  
25                  testing using a 3,000 pound moving deformable barrier,

1 but at 50 miles an hour and using a 70 percent overlap,  
2 targeting the side of the vehicle which has the fuel  
3 neck.

4 We've done a fair amount of testing  
5 with that. General Motors did some testing of that  
6 and that work has been completed. Recently what we've  
7 been trying to do is actually do some test  
8 repeatability and reproducibility testing.

9 We did a couple of very small  
10 vehicles in July, Geo Metro and a Mazda Miata, to look  
11 at the effect of this type of test on those vehicles,  
12 and we also did some repeatability tests with TRC and  
13 **CalSpan** using a Cavalier and Honda Civic.

14 Both of those vehicles had been  
15 tested by General Motors. Generally we got roughly  
16 comparable results when we ran those tests compared to  
17 the GM results.

18 Given what we think has been the  
19 positive results of the research on this to date, we  
20 are still planning on issuing an NPRM and it will  
21 probably be late spring.

22 Any questions?

23 Question 22, what is the status of  
24 the next agency action following our 1997 NPRM on  
25 deleting material specifications for compressed

1 natural gas fuel cylinders.

2 **That's** out. I'm very pleased to  
3 announce that. Final rule was published on December  
4 3. It did delete many material and  
5 manufacturing requirements from the standard.

6 The next question is a kind of  
7 obvious follow-up to that and that ANSI, ANSI has just  
8 issued new performance requirements in June which has  
9 additional performance requirements beyond what the  
10 agency has in its standard.

11 There's a large number of actually  
12 additional ANSI performance requirements for CNG fuel  
13 containers. There's pendulum impacts, there's gravel  
14 impacts, all these strange things they throw in there.

15 If we were to incorporate those  
16 within Standard 304 or 305 we would have to have a  
17 separate NPRM. Right now we're not working on  
18 anything on that.

19 If people believe that there's a  
20 real need for these tests, that **it's** necessary to  
21 have these tests in a Federal Motor Vehicle Safety  
22 Standard to address a real safety need, if you can make  
23 a case with us -- to us for them, please let us know.

24 Any questions?

1                   Okay, 24. Why do I have to answer  
2 this question? This is an R&D question. LTV car  
3 crash compatibility. Maybe Ray Owings will talk  
4 about it more this afternoon.

5                   **We've** been working on this for the  
6 past year or so. We had the round of side impact  
7 tests that were done involving striking a Honda Accord  
8 with an Explorer, Chevy S-10 pickup, Chrysler --  
9 Daimler -- that was a Chrysler **minivan** then and a Chevy  
10 Lumina.

11                   Those test results were released, I  
12 believe, in June. We also have done frontal tests with  
13 a 70 mile an hour closing velocity. These were 30  
14 percent offset tests with the same vehicles.

15                   The idea was to look at the  
16 structural interactions and dummy performance in those  
17 tests. Those tests are completed and **I'm** not sure  
18 when they will be released, probably next month, but  
19 Ray can perhaps provide some more information on that.

20                   Some other tests are also being  
21 considered involving a large pickup and a large van.  
22 I think right now they're thinking of a Chevy 1500  
23 pickup and Ford Econoline van.

24                   These tests are being done to  
25 support the development of finite element models for

1       these vehicles, which can then be exercised in a wide  
2       variety of simulated traffic environments to evaluate  
3       the compatibility of impacts and what the effects are.

4                       Again, this is all research right  
5       now. This is not planned for rulemaking at this  
6       point. **It's** a long term research effort and we have  
7       no plans right now for rulemaking on this.

8                       Any questions? If you have them,  
9       ask Ray.

10                      Question 25, status of the agency's  
11       response to the **AAMA/AIAM** petition of harmonization of  
12       the side impact standard. What we've been emphasizing  
13       recently on this has been working on the EuroSID,  
14       trying to solve problems with the EuroSID.

15                      As I'm sure everyone knows, there  
16       are a lot of longstanding problems that both we and  
17       the industry have had with the EuroSID.

18                      The most prominent one has been  
19       this flat-topping phenomenon on the rib displacement  
20       modules; that the tops of the sine waves are  
21       clipped off. ASTC, the other dummy manufacturer,  
22       developed a rib module to attempt to address the flat  
23       tops and eliminate it.

24                      The Research Office did a number of  
25       pendulum tests with these rib modules, and the flat tops were

1 significantly reduced.

2 Also Transport Canada did a couple  
3 of vehicle tests, I believe **it's** a Ford Taurus and a  
4 Geo Metro, which they still I understand had flat  
5 topping in the Taurus test, although there was a  
6 reduction from the previous test.

7 These modules we tested were rib  
8 modules that were developed by ASTC. In January TNO,  
9 the Dutch dummy manufacturer, will give us a  
10 revised set of their own rib modules using the ASTC  
11 fix.

12 Those will be provided to us and to  
13 Ford to do some testing.

14 Also **TNO** expects to -- assuming  
15 the testing with those rib modules are successful, **TNO**  
16 expects to have a new version of EuroSID available  
17 by the summer of '99 which is now being referred to as  
18 EuroSID-2.

19 Right now I think our main effort  
20 is only harmonizing the dummy. Assuming that  
21 EuroSID-2 turns out to be a satisfactorily performing  
22 **dummy**, right now we think that the major avenue of  
23 harmonization would be for us to use the EuroSID  
24 dummy, the EuroSID-2 dummy, as our dummy so that we  
25 could use EuroSID-2 dummy as a world dummy, at least

1       until the **Worldsid** effort, which is on a separate  
2       track, is completed.

3                       We are also finishing up a side  
4       impact research plan and that plan is being  
5       incorporated into a report to Congress that we're  
6       finishing right now, which **we'll** probably have out in  
7       February.

8                       I **don't** want to steal Ray's thunder  
9       about **what's** in the research plan, but the plan will  
10      outline a near-term research program over, say, two or  
11      three years in support of a rulemaking decision for  
12      upgrading Standard 214.

13                      It also includes a cooperative  
14      global research agreement through the IHRA program  
15      over about five years and we will be reevaluating the  
16      U.S. experience as far as the crash environment, and how  
17      the fleet has changed since the agency established the  
18      rule in the early 90s.

19                      As far as the European test, I  
20      think the agency is becoming less -- not that we ever  
21      were overly enamored, but probably are becoming even  
22      less enamored of the European test. The barrier is  
23      just so light we think **it's** so unrepresentative of the  
24      U.S. crash experience, even though the way it comes in  
25      does result in a fairly substantial whack on the front

1 seat dummy, it does not really exercise the rear seat  
2 dummy at all, assuming you have a rear seat dummy  
3 there.

4 And so I think right now our  
5 efforts are truly focused on getting the **EuroSID** fixed  
6 and using that as a world dummy for the interim.

7 Any questions on that? People  
8 really do want to go shopping, don't they?

9 Well, I **don't** want to hold you up.  
10 Number 26, multi-stage vehicle certification and the  
11 planned regulatory negotiation on that.

12 That is going to happen soon. As I  
13 pointed out, I believe, at the last meeting we had a  
14 problem that arose that we weren't aware of in that  
15 there were congressional restrictions on the amount of  
16 money that we could spend on advisory committees, and a  
17 negotiated rulemaking committee is an advisory  
18 committee. There's a one million dollar ceiling for  
19 the department as a whole as to how much it could  
20 spend on advisory committees, and generally that  
21 ceiling is allocated among the various modes of the  
22 department based on their share of the department's  
23 budget.

24 Well, NHTSA has about one percent  
25 of the department's budget, so that would give us



1 about \$10,000. That doesn't really allow us to do a  
2 very good negotiated rulemaking.

3 However, we talked to Congress and  
4 said, "**how** about exempting negotiated rulemaking  
5 committees from that **cap**" and due to our incredible  
6 persuasiveness they actually agreed. In our '99  
7 budget, negotiated rulemaking committees are excluded  
8 from the one million dollar advisory committee cap for  
9 the department.

10 So we're going forward with this.  
11 We have a contract with a consultant, Phil Harter  
12 who has done a lot of regulatory negotiation  
13 work for the department. What **he's** been doing is  
14 contacting a lot of people to assess the feasibility  
15 of negotiated rulemaking working on this issue and  
16 also contacting potential participants in it to see  
17 about what their reaction would be to it.

18 We expect to have a report from  
19 Phil in the next week or so and assuming **it's** positive  
20 which I believe it will be, we will get out an  
21 announcement of the process indicating our intent to  
22 start this sometime next month.

23 No questions, huh?

24 Question 27 is same as 18. **I've**  
25 answered this one enough recently.

1                   Question 28 on offset frontal  
2     testing I believe we've answered in Question 17.

3                   Question 29 is asked about the  
4     Advocate's petition on 214, **what's** the agency's plan.  
5     I think **I've** basically talked about it, but this will  
6     all be driven by the side impact research plan.

7                   The side impact research plan on  
8     Standard 214 is going to be the vehicle that we're  
9     going to use to address future rulemaking on this.  
10    **We're** trying to link everything together on the  
11    rulemaking and global efforts in this area to make  
12    sure that we do something that works globally as much  
13    as possible, so we're not planning on having any sort  
14    of specific proposal out on the Advocate's petition  
15    soon.

16                  Of course, we have granted it, but  
17    we are seriously interested in updating and upgrading  
18    the standard. If we end up with a global standard on  
19    this one, I think this will be one where we end up  
20    with a harmonized dummy and maybe a harmonized test  
21    procedure across the globe but maybe with different  
22    striking barriers of different masses and stiffnesses.

23                  I think **it's** very clear that on  
24    this concept of the global agreement where you often  
25    have the same performance tests, but various

1 gradations of stringency depending on the country, we  
2 would end up with the most stringent version because  
3 of the different fleet characteristics in the United  
4 States compared to other countries.

5 Any questions on that? I'm going  
6 to pay George to come up with some more crash  
7 avoidance questions. They pay him to have  
8 crashworthiness questions.

9 MR. PARKER: I will note that  
10 Question 31 is actually a crash avoidance question.

11 MR. SHELTON: We figured that out.  
12 Okay, George, we'll give you credit for one. Now, if  
13 you can only get the crashworthiness questions down to  
14 one for the next meeting.

15 Actually, the next meeting I will  
16 probably need a lot of questions from AIAM since we  
17 won't be getting any AAMA questions I assume. Although,  
18 on the other hand, individual companies are free to  
19 send us questions.

20 Question 30 asks about the side  
21 impact NCAP program and the use of the SID-Hybrid-3  
22 dummy that we established for the 201 pole test.

23 We are planning to use that dummy,  
24 but only on a voluntary basis right now. We think  
25 that manufacturers that developed head bags and used

1 the dummy in their development would be interested in  
2 having us use that dummy for side impact tests  
3 in the NCAP program.

4 **We've** actually got sort of mixed  
5 results on that. Some of the manufacturers, despite  
6 the fact that they use that dummy for their pole test  
7 development program, did not really use it for their  
8 regular side impact development program. Ford  
9 has indicated that they would like us to use that  
10 **dummy**, so we will be using that dummy for the **Windstar**  
11 van test which should be done this week.

12 We don't have -- right now we're  
13 interested in using that dummy just because we can get  
14 additional injury measures off of it. In this case,  
15 HIC in particular. **It's** just a data collection  
16 effort.

17 Right now we have no plans to go  
18 from the conventional SID dummy to this dummy for the  
19 side impact NCAP program. **It's** just being  
20 used on a voluntary basis for manufacturers if they've  
21 used it for their own development purposes.

22 Any questions?

23 **Okay**, 31, the hidden AIAM crash  
24 avoidance question which I believe Steve really

1 answered before including Question 6.

2 Any more to say, Steve?

3 MR. KRATZKE: Yeah, keep going.

4 MR. SHELTON: **Okay, I'll** keep  
5 going. Question 32 is basically the same as Question  
6 10 on the laboratory test procedure for new 201.

7 Question 33 asks about the dummy  
8 status. **I've** basically answered the question as far  
9 as the three year old dummy is concerned and the 12  
10 month old CRAB1 dummy is concerned.

11 As far as the six year old child  
12 dummy and the fifth percentile female dummy, the six  
13 year old dummy notice was issued in late June.

14 My understanding is we have  
15 received 21 comments on the six year old dummy  
16 proposal. They're primarily on revisions to and the  
17 possible relevancy of some of the calibration  
18 specifications.

19 Also there is some concerns about  
20 the adequacy of some of the instrumentation  
21 specifications as well as dimensional locations.

22 Right now we **don't** see any  
23 overwhelming issues on the six year old dummy. As far  
24 as comments on the fifth percentile female dummy,  
25 comments were due on December 2 and we have received

1 11 comments to date. They're similar to the issues  
2 that have been raised for the six year old dummy.  
3 Right now we expect to get both of those rules out in  
4 roughly April, final rules.

5 Any questions?

6 Question 34 deals with the Ford RVA  
7 petition on raised roofs and I answered that in Number  
8 19.

9 Question 35, we'll let Steve go for  
10 a while on this one.

11 MR. KRATZKE: And I will go for a  
12 while to give you a breathing break, Bob. **It's**  
13 getting hard over there.

14 Also for those of you who may have  
15 noticed my eyes rolling when Bob was discussing the  
16 problems with the dummy because of the different mass  
17 of the skin because **of its different thickness, all**  
18 the division chiefs and the people who go to Geneva in  
19 my office were sent over for a week of training at the  
20 Department of State last week to learn how to  
21 negotiate effectively for the United States when we go  
22 to Geneva. It's a great idea and we had an  
23 opportunity to get trained by the State Department.

24 They tell you don't snicker at  
25 somebody's reciting something, so I'm working on my

1 skills.

2 The parts of consumer information  
3 I'd like to talk about are braking and lighting. On  
4 braking, we finished some preliminary testing at the  
5 Vehicle Research and Test Center in early '98. We've  
6 gone back and forth on a final report a few times.  
7 We've also asked them if they could get a rollover  
8 program done pretty quickly, so they've been busy on  
9 other things, but we hope to have a report on that  
10 available and in the docket in January.

11 Based on the initial testing, we  
12 focused on straight line stopping distance tests from  
13 100 kilometers an hour on wet and dry asphalt in both  
14 loaded and unloaded conditions.

15 We tested ten additional vehicles  
16 at the Aberdeen test center. These were five  
17 passenger cars, one **SW**, two minivans, one full-size  
18 van and a pickup.

19 The testing was completed at the  
20 end of November. With the exception of the pickup  
21 which had rear wheel only ABS, all the vehicles had  
22 four wheel ABS. That lead us to a panic-type full  
23 brake application to get much more consistent  
24 repeatable stopping distances.

25 We're also doing statistical

1 analyses of the shopping distance results to calculate  
2 a 95th percentile confidence interval. This test  
3 report should be available in our docket in February.

4 We plan to get public input on this  
5 subject after the test reports are available in the  
6 docket and after we've decided what we're going to do  
7 to follow up on that. We expect something in the  
8 spring of '99.

9 Any questions on braking? George?

10 MR. PARKER: George Parker, AIAM.  
11 Would that be a request for comments or a public  
12 meeting or something, Steve, or --

13 MR. KRATZKE: It could be a lot of  
14 things. At this point, I **don't** know. I would like it  
15 to be something besides a generic request for comments  
16 because if you ask me to go somewhere and you've  
17 prepared a game of the comments, my guess would be the  
18 manufacturers would say, "**Don't** do comparative  
19 stopping distance **information**," and the consumer  
20 groups would say, "**Go** for it, **guys**," and we would  
21 have some reasons on both sides and it wouldn't really  
22 help anyone to do that. I think it would be more  
23 useful for the agency to say, "**Here's** what we've done  
24 and **here's** what we suggest could be done with it.  
25 What do you **think**?"



1                   In other words, give you something  
2           to shoot at, to think about. Requests for comments  
3           generally are broader, more generic things, so I  
4           wouldn't expect it to be just that.

5                   MR. PARKER: But in this case **it's**  
6           a consumer information program, so you have a  
7           different type of request.

8                   MR. KRATZKE: Oh, yeah, it could  
9           have that title. What I was trying to get across is I  
10          **don't** want to put out a generic thing that says, "**Here**  
11          are two test reports. What do you **think?**"

12                   I'd rather have a step beyond that  
13          and I don't know what that step will be because we  
14          haven't discussed it with people.

15                   MR. SHELTON: Actually, this is  
16          sort of a follow-up, George, to the famous "**Tom** Terry  
17          agreement" where Tom Terry at one of the first meetings  
18          Steve and I did here stood up and somehow got me to  
19          promise to say that before we ever do a major consumer  
20          information program **we'll** give you a chance to comment  
21          on it first. Since I'm a firm believer in  
22          sticking to my agreements, even those with Tom Terry,  
23          we will have something out in the spring to give you  
24          folks a chance to react to the program.

25                   MR. KRATZKE: Thank you. On

1       lighting, we haven't done as much. We have met with  
2       Visteon and what is now Guide Corporation and when we  
3       did it they were called Ford and General Motors.

4                 We expect to publish a contract,  
5       request for proposals, sorry, next week in which we  
6       will ask someone to review the procedures these two  
7       companies use to evaluate headlamp performance and to  
8       assess the feasibility of implementing something like  
9       that.

10                Our goal as I've said every time I  
11       answer the question is to allow us to turn on the  
12       lights, shine the lamps on a screen and have software  
13       compute a value for that based on the amount of light  
14       at various points. We'll see.

15                But we are going to go with a  
16       contract. In addition, before I give it back to Bob  
17       and to try to give him a longer break, I'd like to  
18       make you aware that I and other folks from NHTSA met  
19       with a representative of TRL which is a UK research  
20       lab and a member of the UK government to talk about  
21       that country's -- I'm sorry, yes, TRL is now private.

22                In fact, we had a great discussion.  
23       I didn't know there was anything left to be privatized  
24       after Margaret Thatcher.

25                In addition to the TRL

1 representative, Mr. Geoff Harvey was there, who is a  
2 member of the government in the United Kingdom, to talk  
3 about that country's efforts to provide additional  
4 consumer information in the areas of crash avoidance  
5 and to discuss what NHTSA was doing in this area.

6 Those gentlemen indicated they were  
7 going to Japan and Australia following the meeting  
8 with us.

9 As we've promised repeatedly in  
10 this area, what we do will be coordinated with other  
11 countries. I'm not going to repeat how we've  
12 coordinated carefully with Japan on our braking  
13 efforts, but we are trying to keep our word.

14 And with that, I will give it back  
15 to Bob for a lot more.

16 MR. HOUSTON: Dave Houston with  
17 Ford. Do you have any idea who may be interested in  
18 the request for proposal?

19 MR. KRATZKE: No. Honestly, we  
20 haven't gone out and seen whether a university or a  
21 contracting official or anybody is interested in it.  
22 We're putting it out. We're making it known through  
23 the SAE Lighting Committee, through other things that  
24 we're doing this so that we'll get the usual suspects.

25 I hope there will be people

1 interested, but it should be published in a couple of  
2 weeks.

3 Any other questions?

4 MR. SHELTON: Okay. I'm going to  
5 finish up this question, but I'm going to try to be  
6 very brief.

7 Several items. I hope people have  
8 seen our new car safety features brochure which we just put  
9 out. I really appreciate all the help that people  
10 gave us in putting that together.

11 It lists selected safety features  
12 that are available in cars. This is something that we  
13 did in the Buying a Safer Car brochure, but the problem  
14 with the Buying a Safer Car brochure is we **can't** get  
15 the one out for the current model year until typically  
16 March or April when people say, "Well, we buy cars  
17 earlier, so **we'd** like to get some information **now**,"  
18 but that brochure always waits for NCAP results,  
19 so that delays it.

20 We will still be putting that out,  
21 but we thought, well, can we get something out earlier  
22 in the year with new car safety features per se which  
23 didn't have crash test results?

24 Actually, Nobel **Bowie's**  
25 office, the Office of Planning and Consumer Programs,

Heritage Reporting Corporation  
(202) 628-4888

1 did a really good job on getting this thing done quickly.

2 The idea just came up this summer  
3 and we got it out early this month, but I appreciate  
4 all the help from you folks too.

5 This is being distributed through our  
6 normal channels, for example, AAA is distributing them.  
7 **It's** also going to be on our **website** and the Hotline.  
8 We've also sent copies to individual companies.  
9 We did kind of a mass mailing of that.

10 One of the things that has been  
11 interesting to us is that we're getting a lot  
12 of requests from manufacturers for copies of the  
13 brochure.' I think they're watching their competitors  
14 and trying to see what everybody else has in their  
15 cars, and so far we're getting very good feedback on  
16 this.

17 Actually Don Bischoff, our executive  
18 director, went up to a meeting that the Secretary has  
19 with the senior staff of the department and used that  
20 as an item to discuss as one of the recent things that  
21 NHTSA had put out. It was so popular that when the  
22 Secretary was talking, everybody was looking at their  
23 features brochure instead of listening to him, so we  
24 will probably pay for that somehow.

1                   But we also -- you should have all  
2 finished reviewing the drafts for the new version of  
3 the Buying a Safer Car for Child Passengers brochure.

4                   If you have not got comments back  
5 to the agency on that, please get them back to Roger  
6 Kurrus or Darlene **Curtin** soon so we can  
7 get that done.

8                   MR. Willson: **Who's** reviewing  
9 this? I haven't seen it.

10                  MR. SHELTON: Well, **we'll** have to  
11 see why you **don't** have it. **It's** out there. I know we  
12 sent it out. This is a draft text for the Buying a  
13 Safer Car for Child Passengers brochure.

14                  MR. PARKER: George Parker for  
15 AIAM. For AIAM members that came to me I sent them  
16 out, but **AAMA** is having some expanding problems, they  
17 didn't get them.

18                  MR. SHELTON: Well, **I'm** trying to  
19 remember how we actually sent it out. It may have  
20 gone to AAMA also for AAMA to distribute. I don't  
21 recall. It was several weeks ago.

22                         **We'll** get them to you. **We'll** check  
23 into that.

24                         We will get another shot at it  
25 also. We are going to -- once we have the thing

1       finalized once we get your comments and obviously you  
2       have to get it from us to give comments to us, you  
3       will have another shot at it before we put it in  
4       absolute final form and get it out next month.

5                       In other items, as you know we  
6       released a couple of months ago the list of NCAP cars  
7       for this year, 32 frontal tests, 31 side tests. We're  
8       starting to do a number of truck side tests.

9                       We're going to see a lot of five  
10      star trucks. That's not really surprising, but we are  
11      going to have quite a few of them.

12                      Also, one of the things that we are  
13      considering putting out is some sort of recommended  
14      practice or advertising guidance on NCAP.

15                      We are seeing a lot more  
16      manufacturers advertising NCAP results and we want to  
17      make sure that those results are portrayed accurately  
18      and fairly. We're thinking of doing something -- it  
19      would be very informal. We have put together a draft  
20      within the agency, but we need to circulate it within  
21      the agency. I need to talk to Dr. Martinez about it to make  
22      sure that **he's** comfortable with that.

23                      But we are considering that. We  
24      don't want someone to start adding side scores and  
25      front scores together and coming out with, "**We** have a

1       20 star **vehicle**," or things like comparing  
2       scores from a GM Metro to a Lincoln Navigator.

3                       We **don't** want to mislead the public  
4       on that, so **that's** something that has arisen as an  
5       issue in the last couple of months just because more  
6       manufacturers are advertising NCAP scores and if you  
7       -- we **don't** want to get into the issue of pre-clearing  
8       ads, but if you want to discuss the use of NCAP data  
9       with us before you use it for marketing purposes,  
10      we're glad to do that, but, trust me, we **don't** want to  
11      get into the pre-clearing business.

12                      With that I'm going to wrap up  
13      Question 35 and go on to Question 36.

14                      36 asks about the revised sport  
15      utility rollover label. This is the more graphic  
16      colorful rollover label where we had the proposal out  
17      in April.

18                      We have -- we are finishing up a  
19      final rule on that. What we're doing right now is  
20      testing the revised labels with consumers to make sure  
21      they understand the message of the graphics.

22                      We've done some testing in Owings  
23      Mills, Maryland at the end of November and in  
24      Charlotte, North Carolina the first week in December.

25                      Preliminary results are that we're



1 getting a very high consumer recognition and  
2 understanding of the message.

3 Assuming that **holds** up, we expect  
4 to issue a final rule on this in February.

5 Any questions?

6 Question 37. Please update our  
7 assessment of the Consumer Group petition which was  
8 filed in mid-February on the publication of extensive  
9 **airbag** design and performance data.

10 We were petitioned back in November 1997,  
11 initially by Public Citizen, to provide information to  
12 the public on various physical characteristics of  
13 **airbags** such as deployment thresholds, inflation  
14 force, excursion distances, etc.

15 Subsequently there was a petition  
16 in February, '98 which Public Citizen also signed, but  
17 it was signed by the American Academy of Pediatrics,  
18 Center for Auto Safety, Consumer Federation of America  
19 and Parents for Safer **Airbags**, which is similar to  
20 the earlier petition, and also requested that we require  
21 manufacturers to provide this data at the point of sale.

22 We had a couple separate -- as a  
23 related activity we had a couple of separate  
24 information requests that we sent out, one to auto  
25 manufacturers in December 1997 and one to **airbag**

1 suppliers in April 1998.

2 The **airbag** supplier response was  
3 really done primarily for the advanced **airbag**  
4 rulemaking and we used that to help us put that  
5 together to get current indications on the state of  
6 the art.

7 There is actually a summary of the  
8 **airbag** supplier responses in Docket 4405. **It's** a very  
9 brief summary. Obviously the data that came back from  
10 the **airbag** suppliers was extremely confidential, so  
11 what we're able to say publicly was pretty brief.

12 It was kind of like everyone is  
13 working on advanced **airbags** and they're really cool,  
14 but the vehicle manufacturer information request  
15 asked for information on vehicle belt systems and  
16 physical characteristics of **airbags** for the '90 to '98  
17 model years **Ray's** office has been doing yeoman work  
18 on compiling that data and analyzing that data.

19 It is now all compiled and is in a  
20 common database and the R&D office is working on  
21 analyses of that data. I think they will probably end  
22 up with at least a couple of major analyses.

23 One will be just sort of a  
24 statistical analysis on what that data shows as far as

1       how **airbag** characteristics had changed over time say  
2       in sizing or venting or force, or whatever.

3                       That's, I think, a fairly  
4       straightforward analysis to do. The more complex  
5       analysis is trying to see if there's any correlation  
6       between the physical characteristics of the **airbags**  
7       and the actual crash experience of vehicles. That's  
8       a longer more complex analysis and that probably **won't**  
9       be completed until spring or summer of next year.

10                      Now, until that analysis is  
11       complete, we won't be responding to that request.  
12       Any questions on that?

13                      Question 38. Is the brochure  
14       summarizing all labeling and consumer information  
15       requirements in the **FMVSSs** expected to be released  
16       soon.

17                      The answer is yes. Actually I have  
18       one here. That was -- someone told me I could bring a  
19       whole bunch up here to distribute. I said, "**Well, I'd**  
20       actually like to read it **first,**" so I'm going to take  
21       a quick look at it and we'll have it out very soon and  
22       we will send it to you.

1                   Basically what it does is just  
2       summarize where labeling and consumer information  
3       requirements are located in each of the standards.  
4       **It's** a very short brochure which **we'll** make widely  
5       available.

6                   There is also a companion brochure  
7       which is being developed by the Safety Assurance  
8       Office which is a revision to an older brochure of the  
9       agency on -- which kind of summarizes the standards,  
10      and we're going to have both of those available very  
11      very soon and we will send them to you.

12                  They will also be on the **website**,  
13      Hotline, our usual distribution locations.

14                  Any questions?

15                  Question 39, in May of this past  
16      year -- of this year we had an NPRM to remove a  
17      Consumer Information Requirement requiring  
18      manufacturers to provide UTQGS information at the  
19      point of sale for new vehicles.

20                  Comment period ended July 20th.  
21      What are you doing on this? We're trying to wrap it  
22      up and we expect to have it out by March.

23                  Any questions on that?

24                  With that, I am going to defer to  
25      Mr. Kratzke for Questions 40 and 41.

1 MR. KRATZKE: Thanks, Bob. I  
2 remember when rollover had a whole section. Now **it's**  
3 just miscellaneous. For those who are still  
4 interested in this miscellaneous little item, we  
5 finished our dynamic testing, as you know, in  
6 September out at our Vehicle Research and Test Center.

7 Since then we've been trying to  
8 grind through those results. We have also gathered  
9 information on static metrics for a number of vehicles  
10 and we're grinding through that and **we're** looking at  
11 on-road crash data, grinding through that and seeing  
12 how these three boxes correlate to each other.

13 As you probably remember, if any of  
14 you read the LTV compatibility thing we promised we  
15 were going to have a decision this month. We're not,  
16 and it's my fault, we haven't taken our analyses up to  
17 the administrator yet and the reason is we haven't  
18 finished it yet. We will in January.

19 We hope that when we have that and  
20 when we have a decision **you'll** have a whole bunch of  
21 information about it including reports on the dynamic  
22 testing that we've done and a document that records  
23 what the agency made of that and what information we  
2 4 thought was significant in leading to whatever action  
25 comes out.

1                   We **don't** know what that's going to  
2                   be now because we haven't made a decision yet.

3                   Is that amorphous enough? **Any**  
4                   questions?

5                   This should be interesting.   None,  
6                   good, thank you.

7                   MS. GREENBERG:   Sally Greenberg,  
8                   Consumer% Union.   When you say that **you'll** finish the  
9                   analysis in January, when will there be something  
10                  available for us to take home?

11                  MR. KRATZKE:   Good question.  
12                  Usually I'm really hung up on months.   I found if I  
13                  **don't** set a month as a target, it tends to miss, but  
14                  this time I'm going to say spring.   Spring is not a  
15                  month, spring is three months, actually four, but it  
16                  **won't** happen sooner than that.

17                  MS. GREENBERG:   So data will be  
18                  available or a report will be available in the spring?

19                  MR. KRATZKE:   We want to do more  
20                  than just dump out the reports.   We would like to have  
21                  something with it again that says the agency decided  
22                  to do this in light of this, not just say all right,  
23                  **here's** our information, **we'll** check back in half a  
24                  **year** or so, tell us if this gives you any problems or  
25                  insights.

1                   But **we'll** see.   Any other  
2                   questions? All right.

3                   With that, **we'll** move on to inside  
4                   trunk releases.   On December 1 NHTSA announced the  
5                   formation of an expert panel to study trunk  
6                   entrapment.   We asked Dr. Heather Paul of the  
7                   National SAFE KIDS Campaign to chair that.   She's  
8                   gotten an agreement now from 25 individuals to serve  
9                   on the panel, along with eight government agencies as  
10                  observers.

11                  **It's** going to include safety  
12                  advocates, law enforcement professionals including the  
13                  director of the Center for the Study of Violent Crimes  
14                  for the FBI, medical professionals, and vehicle  
15                  manufacturers and Bob pointed out a real important  
16                  part of it will be people who are experts in child  
17                  behavior including toy manufacturers who seem to have  
18                  pretty good luck at getting things kids like to fool  
19                  around with.

20                  This group will meet for its initial  
21                  meeting January 21 at the headquarters of the National  
22                  SAFE KIDS Campaign in Washington.   To help the panel  
23                  along, NHTSA is reviewing all the data sources it can  
24                  find to quantify the problem.   As part of our fact  
25                  gathering we are going to get data from the woman

1 Jeanette **FENNELL** who started the organization  
2 TRUNC, Truck Releases Urgently Needed Coalition, in San  
3 Francisco.

4 She has a database of more than **700**  
5 incidents of truck entrapment. We are entering into  
6 the pilot program with the National Center for Health  
7 Statistics that I talked about before in connection  
8 with power windows.

9 We yesterday had an interesting  
10 morning. General Motors had a press conference  
11 to announce the availability of trunk release kits to  
12 the public. They had lined up Senator Hatch and  
13 Representative Stupak who was the congressional  
14 sponsor of the provision in tea-21 that required NHTSA to  
15 do the trunk release study.

16 Our deputy administrator Phil **Recht**  
17 was there and there was an event in which two  
18 members of Congress, the NHTSA and others commended  
19 General Motors for its work, two networks plus CNN  
20 were there, so it looked like it was going to be a big  
21 news story last night. Senator Hatch was on  
22 television last night, but he wasn't talking much  
23 about the GM trunk release.

24 So bad luck for General Motors.

25 MR. SHELTON: Even worse luck for Saddam



1 Hussein.

2 MR. KRATZKE: But we're going to  
3 continue gathering this. Bob has been designated as  
4 our official representative on the expert panel. I  
5 will be there with him as will staff people. We're  
6 taking it seriously.

7 They're supposed to finish by mid  
8 '99 although Heather Paul yesterday indicated she  
9 wanted to be done by April to give it to NHTSA, so  
10 something could happen and we think **it's** moving along  
11 pretty well.

12 Any trunk latch questions? If not,  
13 **I'll** send it back to Bob to finish this off.

14 MR. SHELTON: Thanks. Question 42,  
15 the status and **NHTSA's** views on industry efforts to  
16 promote a global glazing regulation.

17 We've actually been interested in  
18 this for quite a while. The agency has been working  
19 with SAE on bringing Standard 205 and ECE R43 closer  
20 together for some time. We long ago adopted the ECE  
21 test fixture, even before the SAE adopted it.

22 But there are still of course a lot  
23 of differences between the standards. We have had a  
24 couple of briefings from the industry on work **that's**  
25 been done in this area.

1                   When you look at the changes that  
2                   are being proposed, we have both additional tests and  
3                   deleted tests for certain items of glazing.

4                   At this point the agency has not  
5                   gotten heavily involved in putting any sort of  
6                   proposal together on this area. We have not been  
7                   petitioned to adopt a global glazing regulation or to  
8                   adopt the ECE regulation, so there is no status on any  
9                   particular action item to report.

10                  There's still testing going on on  
11                  the relative performance of the ECE glazing versus  
12                  U.S. glazing and right now I'm told before the  
13                  research is done we're not taking any action on this.

14                  Any questions?

15                  Question Number 43. Standard 305,  
16                  electric vehicle crashworthiness. We had the proposal  
17                  out earlier this year. The comment period closed  
18                  November 27th. Again, it was based on SAE Recommended  
19                  Practice 1766 regarding electrical isolation and other  
20                  such items.

21                  We've received 12 comments so far  
22                  on the proposal. They're in the docket. You can see  
23                  them in Docket Number 4515. Right now we're not  
24                  seeing any wide-spread opposition to the standard for  
25                  vehicles under 10,000 pounds.

1                   A couple of commenters proposed  
2           that we wait for an SAE recommended practice for  
3           school buses of over 10,000 pounds. We haven't made  
4           any decisions yet on this item because the comment  
5           period just closed a few weeks ago.

6                   Right now we're anticipating a  
7           final rule out on the standard either late spring or  
8           early summer.

9                   Any questions?

10                  Question 44. I can't believe we  
11           get a question on metric conversion. Slow day at  
12           AIAM.

13                  **"What** is the expected date for the  
14           final rule on conversion of Standard 208, 214 and Part  
15           572, which is the dummy regs, to metric **measurements."**

16                  Right now, we're probably going to  
17           split that up into two parts. We will put out an NPRM  
18           on 214 sometime in the spring.

19                  As far as 208 and 572 are concerned,  
20           because those are being totally rewritten with  
21           the advanced **airbag** rulemaking ongoing and that includes  
22           measurements to a large extent in that, we **won't**  
23           complete -- we **won't** do any cleanup on those two  
24           standards until after that rulemaking is completed.

25                  Any questions?

1                   Question 45 one of our rare  
2 enforcement questions. Maybe this is in response --  
3 well, actually wasn't it AIAM who last meeting  
4 suggested enforcement questions are totally  
5 inappropriate for this meeting and yet AIAM asked an  
6 enforcement question?

7                   MR. PARKER: No, about specific  
8 manufacturers.

9                   MR. SHELTON: I think it was a  
10 broader philosophical point that AIAM was trying to make --

11                   Nevertheless, the question is, what  
12 is the status of a notice to propose a longer lead  
13 time between the 573 letter and the requirement to  
14 notify dealers to stop selling cars?

15                   I understand the way it works  
16 currently is that manufacturers are required to notify  
17 dealers within five days after they notify NHTSA so  
18 that car sales can be stopped on possibly defective  
19 vehicles.

20                   We have a SNPRM which is being  
21 developed on this to address the issue. Right now  
22 **it's** with the administrator and Ken had to talk to him  
23 about that and we hope to get that out in the next few  
24 weeks.

25                   I **can't** really talk about the

1        specifics of it yet because there some points that are  
2        still in flux.

3                        DON **SCHWENTKER**: I think you  
4        misstated it, Bob. I don't think there is such a  
5        requirement now. This is a proposal to place such a  
6        requirement.

7                        MR. SHELTON: I'm not sure about  
8        that, Don.

9                        This is what happens when people  
10       ask enforcement questions at this meeting.

11                      Question 46, **what's** the current  
12       status of the motor vehicle content label review. Our  
13       office -- our Planning Office is doing an assessment  
14       of the domestic content labeling requirements which  
15       were established several years ago.

16                      There has been a survey to vehicle  
17       manufacturers on this. Currently there is a  
18       contractor, Chilton, which is obtaining the remaining  
19       survey questionnaires from manufacturers. They have  
20       received essentially all of them and they also have  
21       responses from dealers.

22                      There is a consumer survey that has  
23       been completed. Right now the contractor is working  
24       on coding and compiling the data which is to be sent  
25       to our Planning Office before the end of this month.

1                   The analysis will then be done by  
2                   the Planning Office during the first part of '99 and  
3                   we expect to get a draft report out sometime this  
4                   year.

5                   I **don't** have more specifics on this  
6                   I think because **it's** so fairly early in the process.  
7                   The planning people are unwilling to commit to when  
8                   they're actually going to get this done.

9                   George?

10                  MR. PARKER:   George Parker, AIAM.  
11                  This year meaning next year?

12                  MR. SHELTON:   1999.   I said this  
13                  year by saying that we're getting data back from the  
14                  contractor by the end of this year, 1998.

15                  Question 47 is the same as Question  
16                  45.

1.7                Question 48 asks about the expected  
18                time frame for issuance of a notice on community or  
19                activity buses.   This deals with transportation of  
20                children for Head Start programs in that a lot of  
21                children are transported for Head Start programs in  
22                buses that are contracted for in local communities and  
23                a lot of these buses are used for other purposes such  
24                as taking senior citizens around for shopping and  
25                things like that and there's been an issue as to

1 whether those buses have to meet school bus standard.  
2 In particular, some of the senior citizen groups that  
3 use these buses don't like to ride around in school  
4 buses, somehow find it demeaning or something, I **don't**  
5 know.

6 We're actually working with Head  
7 Start on this. One of the issues is to whether  
8 Head Start views Head Start as an educational program  
9 or a social services program. If **it's** an educational  
10 program, **it's** pretty tough for the agency to accept  
11 anything other than school buses.

12 At this point, we're still meeting  
13 with HHS and there's going to be another meeting at  
14 the end of January to try to resolve this issue and  
15 once the resolution of that is determined, then **we'll**  
16 be able to decide whether we're going to go for it on  
17 this.

18 So right now **it's** sort of up in the  
19 air whether we're going to go forward with a proposal  
20 on these community or activity buses which would  
21 basically be like school buses, but would have a  
22 smaller subset of requirements attached to them.

23 They probably wouldn't have all the  
24 external things that school buses have like stop arms.

25 Any questions on that?

1                   **Okay** with that we lead to the  
2                   final two questions from the Center for Auto Safety.

3                   Question 49, will NHTSA conduct  
4                   additional **airbag** depowering tests and, if so, will  
5                   they involve a greater variety of vehicles.

6                   We have the six depowering tests  
7                   that we did where we tested 1998 depowered vehicles to  
8                   the 30 mile an hour unrestrained barrier test.

9                   We are right now going to do some  
10                  work with Transport Canada on doing some additional  
11                  tests. Transport Canada is going to do 18 tests using  
12                  their 40 kilometer per hour frontal offset test  
13                  procedure which we also proposed in our advanced  
14                  **airbag** rule.

15                  These are going to be different  
16                  vehicles than Transport Canada has tested previously.  
17                  Also Transport Canada is going to do 24 tests using  
18                  the 30 mile an hour rigid barrier procedure.

19                  However, these will all be belted.  
20                  In those tests half of the dummies will be 50th  
21                  percentile Hybrid-3 males and half will be fifth  
22                  percentile Hybrid-3 females.

23                  Again, they will all be belted  
24                  tests. Any additional tests done by the agency will  
25                  really be tied to the advanced **airbag** rulemaking.



1                   We'll be looking at the comments on  
2 the rule and deciding where we need to go on that to  
3 define further research testing to be done in support  
4 of that rulemaking.

5                   Any questions on that?

6                   Okay. Then our final question,  
7 what new data, if any, does NHTSA have concerning the  
8 occurrence of bottoming out with redesigned **airbags**  
9 involved in high-speed crashes.

10                  As of the beginning of this month  
11 we had received 22 final case reports from the special  
12 crash investigations involving vehicles with depowered  
13 or redesigned **airbags**.

14                  In those cases there has been no  
15 incidents of occupants receiving injuries as a result  
16 of bottoming out. In addition, the agency has another  
17 151 cases under review and I understand that Ray is  
18 going to talk about that this afternoon, so you can  
19 hold your questions until **Ray's** discussion.

20                  Anything else on that.

21                  At this point, I'll open it up to  
22 give people a chance to ask any other questions  
23 besides what happened to the Buying a Safer Car for  
24 Child Passengers brochure.

25                  MR. WILLSON: I want to ask about

1       that.   Howard **Willson** from **DaimlerChrysler**.   Some time  
2       ago it was said that the docket system would begin to  
3       use PDF files as opposed to the TIFF files and now  
4       there appears to be a mix.

5                       Is there still a direction to go to  
6       PDF files?

7                       MR. SHELTON:   I'm not sure that the  
8       docket system is going to use it.   We're trying to use  
9       it more on our **website**.   I'll have to check with our  
10      Counsel's office to see if the docket system is  
11      planning on using it.

12                      I think the docket -- I haven't  
13      heard of the docket system really changing the way  
14      they do it.

15                      I realize with the TIFF files it  
16      takes a long time to download stuff.   It takes a long  
17      time even for us and I'm right above the thing.

18                      MR. WILSON:   It was posted.  It  
19      seems to me in the early activity in the docket  
20      section as it went on line there was a notice -- there  
21      was a comment to the effect that for the moment you  
22      had to live with TIFF.

23                      MR. SHELTON:   Yeah, I remember  
24      there was a comment on that.   I'll have to check on  
25      that, Howard, to see what sort of progress is being

1 made because I understand your concerns on that.

2 It would download a lot faster.

3 MR. WILSON: Not only that, **it's**  
4 usable, **it's** editable if **it's** in TIFF.

5 MR. SHELTON: I'm not sure we want  
6 you to edit docket comments.

7 MR. WILSON: Transfer comments.

8 MR. SHELTON: You could send what  
9 the Center for Auto Safety really meant to say was --  
10 Thanks. Any other questions?

11 MR. NICHOLSON: For Steve. There  
12 is a rulemaking on testing of LED lamp, special  
13 procedures.

14 Could you tell me what the next  
15 step in that would be?

16 MR. KRATZKE: We came out with a  
17 supplemental notice on that. We were waiting for the  
18 SAE to come up with a voluntary standard that would  
19 address these.

20 We terminated rulemaking on it  
21 four years ago. The SAE had made no progress toward  
22 doing it and so we felt an obligation to come out with  
23 something.

24 If the SAE **can't** do it, we can and  
25 **here's** our effort to accommodate LED bulbs.

1       Apparently that has helped the **SAE's** consideration.

2                       I understand that they're  
3       considering it a bit more seriously now and are trying  
4       to come out with the voluntary standard they promised  
5       in 1994.

6                       We are going to permit **LEDs** there.  
7       We **don't** want to have a technical requirement that  
8       prohibits a certain type of lighting.

9                       We would rather use a voluntary  
10      standard.   We would rather have industry agreement on  
11      how to test and how to measure it.

12                      If we get that, we are still very  
13      open to using it.

14                      MR. SHELTON:   Any other questions?  
15      Next meeting is March **18th**, the day before my  
16      birthday, same time, same place -- at's only a slightly  
17      subtle hint, and **I'm** hoping that AIAM will step up to  
18      the plate and give us lots of questions, even if we  
19      don't get any from AAMA, but -- although I will  
20      strongly encourage individual companies to submit  
21      questions for us to address.

22                      George?

23                      MR. PARKER:   If we have a birthday  
24      cake, we would probably be unduly influencing a  
25      government agent.

1                   MR. SHELTON: It probably would be.

2                   It would be wrong. Thanks, George.

3                   With that, **we'll** adjourn the  
4                   meeting for now and I hope people are going to stick  
5                   around for **Ray's** session.

6                   Thank you again.

7                   (Proceedings concluded at **11:59**  
8                   a.m.)

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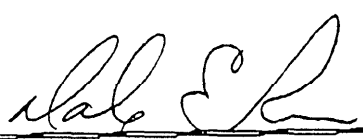
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